

ADMINISTRATIVE RULES Fiscal Estimate & Economic Impact Analysis

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| 1. Type of Estimate and Analysis <input checked="" type="checkbox"/> Original <input type="checkbox"/> Updated <input type="checkbox"/> Corrected | 2. Date |
| 3. Administrative Rule Chapter, Title and Number (and Clearinghouse Number if applicable) Chapter PI 34, Educator Licenses | |
| 4. Subject Clarifying renewal language for educational interpreters and orientation and mobility specialists | |
| 5. Fund Sources Affected <input type="checkbox"/> GPR <input type="checkbox"/> FED <input type="checkbox"/> PRO <input type="checkbox"/> PRS <input type="checkbox"/> SEG <input type="checkbox"/> SEG-S | 6. Chapter 20, Stats. Appropriations Affected |
| 7. Fiscal Effect of Implementing the Rule <input type="checkbox"/> No Fiscal Effect <input type="checkbox"/> Increase Existing Revenues <input type="checkbox"/> Increase Costs <input type="checkbox"/> Decrease Costs <input checked="" type="checkbox"/> Indeterminate <input type="checkbox"/> Decrease Existing Revenues <input type="checkbox"/> Could Absorb Within Agency's Budget | |
| 8. The Rule Will Impact the Following (Check All That Apply) <input type="checkbox"/> State's Economy <input type="checkbox"/> Specific Businesses/Sectors <input type="checkbox"/> Local Government Units <input type="checkbox"/> Public Utility Rate Payers <input type="checkbox"/> Small Businesses (if checked, complete Attachment A) | |
| 9. Estimate of Implementation and Compliance to Businesses, Local Governmental Units and Individuals, per s.227.137 (3)(b) 1., Stats \$0 | |
| 10. Would Implementation and Compliance Costs Businesses, Local Governmental Units and Individuals Be \$10 Million or more Over Any 2-year Period, per s. 227.137 (3) (b) 2., Stats.? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| 11. Policy Problem Addressed by the Rule The proposed rule seeks to create clarity and options for renewal of individuals holding a license to work as an educational interpreter under s. PI 34.086 or an orientation and mobility specialist under s. PI 34.089, Wis. Admin. Code. The proposed rule will provide extensions under these licenses may be sought to provide a one-year option that is nonrenewable. | |
| 12. Summary of the Businesses, Business Sectors, Associations Representing Business, Local Governmental Units, and Individuals that may be Affected by the Proposed Rule that were Contacted for Comments The department held a preliminary public hearing and comment period on the scope statement for the proposed rule. As provided in the hearing notice, any comment received during the preliminary public hearing and comment period are also considered for the development of this economic impact analysis. However, no comments were received to be considered in the development of this economic impact analysis. | |
| 13. Identify the Local Governmental Units that Participated in the Development of this EIA None. | |
| 14. Summary of Rule's Economic and Fiscal Impact on Specific Businesses, Business Sectors, Public Utility Rate Payers, Local Governmental Units and the State's Economy as a Whole (Include Implementation and Compliance Costs Expected to be Incurred) State: The proposed rule will create greater clarity around the renewal criteria for educational interpreters and orientation and mobility specialists. The impact on the number of licenses that may be renewed as a result of this change is determined based on individual behavior and can't be determined at this time. The fiscal impact is therefore indeterminate. Local: No fiscal impact. | |
| 15. Benefits of Implementing the Rule and Alternative(s) to Implementing the Rule The rules governing these licenses currently do not contain any language regarding the length of which an extension under these licenses may be obtained. The proposed rule seeks to repeal and recreate the sections of rule governing renewal to create greater clarity and options for educational interpreters and orientation and mobility specialists. Further, the proposed rule will provide that extensions sought under these licenses by individuals who have not met all | |

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current renewal requirements are for one year and are nonrenewable. Without a rule change, the department will be required to implement ch. PI 34 as the rules currently exist, and licensees may face confusion as a result.

16. Long-Range Implications of Implementing the Rule

The proposed rule will create greater clarity and options around the renewal criteria for educational interpreters and orientation and mobility specialists.

17. Compare With Approaches Being Used by Federal Government

Section 300.34 (c) (4) of the Individuals with Disabilities Education Act defines interpreting services as a related service with respect to educating a child who is deaf or hard of hearing. Under the Act, interpreting services are taken to mean oral transliteration services, cued language transliteration services, sign language transliteration and interpreting services, transcription services, and special interpreting services for children who are deaf-blind.

Additionally, section 300.34 (c) (7) of the Individuals with Disabilities Education Act defines orientation and mobility services as a related service provided to blind or visually impaired children by qualified personnel to enable those students to attain systematic orientation to and safe movement within their environments in school, home, and community. Under the Act, services include teaching children spatial and environmental concepts and use of information received by the senses, to use a long cane or a service animal to supplement visual travel skills or safely negotiating the environment, to understand and use remaining vision and distance low vision aids, and other concepts, techniques, and tools.

However, because education in the United States is typically governed by each state and local government, the Act does not address how states administer the licensure of educational interpreters or orientation and mobility specialists as a related service. As such, federal regulations are generally silent with respect to the licensure of educational interpreters and orientation and mobility specialists.

18. Compare With Approaches Being Used by Neighboring States (Illinois, Iowa, Michigan and Minnesota)

Minnesota: Recent graduates from an interpreter/transliterators training program in Minnesota can receive a two-year provisional certificate during which the licensee must be mentored and have an educational plan in place to complete the license requirements (all certifications and completion of an interpreter/transliterators training program affiliated with an accredited educational institution). A one-time limited extension is available to this provisional license. (Minn. Stat. 122A.31) There are currently no Minnesota Institutes of Higher Education offering licensure programs in Blind/Visually Impaired or Orientation and Mobility.

Illinois: Illinois offers a 5-year approval as a Cued Speech Interpreter, in sign language interpretation, and as an Intervener for Students Who are Deaf-Blind which can be added to a Professional Educator License (PEL) that is endorsed in a teaching field or it can stand alone. These approvals are renewable if 50 clock hours of professional development have been completed. If someone is seeking approval as an educational interpreter and are unable to provide evidence of meeting one of the criteria, there is a one-time interim approval available with evidence of meeting one of the educational component criteria and proof of having attained a score of at least 3.0 on the EIPA. The interim approval lasts two years and cannot be renewed.

Michigan: Educational interpreters who do not score at least a 4.0 on the Educational Interpreter Performance Assessment (EIPA) but plan to work in an elementary or secondary setting may apply for temporary assignment as an underqualified interpreter. These exceptions are provided for one school year and are only granted under specific circumstances with an employing school district request. A qualified interpreter who fails to maintain appropriate CEUs is not eligible for renewal or reapplication until he or she has satisfied all continuing education requirements. Failure to meet renewal requirements before license expiration incurs a reinstatement fee. Unless the fully completed renewal is submitted within 90 calendar days, the licensee shall be required to retest. Michigan currently does not have a state license or certificate for Orientation and Mobility Specialists working in school districts.

Iowa: Licensees may renew their license 60 days before the current expiration date. Licensees are encouraged to renew

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early to avoid a late fee or lapse in licensure. All continuing education requirements must be completed prior to submitting your application for renewal. There is no mention of an extension to meet renewal requirements. Iowa does offer an extension if more time is needed to complete renewal requirements of the Orientation and Mobility Authorization.

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| 19. Contact Name Carl Bryan, Administrative Rules Coordinator Department of Public Instruction | 20. Contact Phone Number (608) 266-3275 |
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This document can be made available in alternate formats to individuals with disabilities upon request.