



**STATEMENT OF CONSIDERATION**  
Relating to 201 KAR 039:075

Kentucky Board of Interpreters for the Deaf and Hard of Hearing  
(Not Amended After Comments)

- I. The public hearing on 201 KAR 039:075, scheduled for August 27, 2024, at 11:00 AM EST in Room 127 CW, The Mayo-Underwood Building, 500 Mero Street, Frankfort, Kentucky 40601 was canceled; however, written comments were received during the public comment period.
- II. The following people submitted written comments:
- | <u>Name and Title</u>          | <u>Agency/Organization/Entity/Other</u> |
|--------------------------------|---|
| Stephanie Overing, Interpreter | Other                                   |
- III. The following people from the promulgating administrative body responded to the written comments:
- | <u>Name and Title</u> | <u>Agency/Organization/Entity/Other</u> |
|-----------------------|---|
| Marva Johnson, Chair  | Board of Interpreters for DHH           |
| Edie Ryan             | Board of Interpreters for DHH           |
| Rebecca Kreutzer      | Board of Interpreters for DHH           |
| Hunter Bryant         | Board of Interpreters for DHH           |
- IV. Summary of Comments and Responses.
1. Subject Matter: Change from Mentors to Supervisors.
- (a) Comment: One comment was received objecting to the amendment requiring a “supervisor” for temporary licensure in lieu of a “mentor”. Specifically, the comment referenced wording about the supervisor of record being responsible for the supervisee and concern that interpreters will not accept that level of responsibility, which may make it difficult for temporary licensees to find a supervisor and create more of a shortage, ultimately taking services away from the community we serve.
- (b) Response: The Board acknowledges this comment but will not amend after comments. KRS 309.312(3) specifically provides for supervision of a temporary licensee under circumstances defined by the board in administrative regulation. Supervision of a temporary licensee is the legally required standard the Board must enforce since the current mentor/mentee relationship is a more relaxed standard than is authorized by statute. The Board’s goal is to comply with its enabling statutes; and for the profession to maintain the same high standards of other professional licensing boards which all require supervision of temporary or associate licensees.

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**Summary of Statement of Consideration and  
Action Taken by Promulgating Administrative Body**

The public hearing on this administrative regulation was canceled; however, one (1) written comment was received. The Kentucky Board of Interpreters for the Deaf and Hard of Hearing responded to the comment and will not be amending this administrative regulation.