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100 Community Place
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Delegate Lily Qi
Montgomery County, District 15
6 Bladen St. Room 223
Annapolis, MD 21403

Dear Delegate Qi and team,

It was a pleasure meeting you all last week and we appreciate your ongoing advocacy on behalf of Maryland's 1.2 million Deaf and hard of hearing constituents.

The Registry of the Interpreters for the Deaf (RID) is currently the only national certifying body for sign language interpreters. Educational Interpreter Performance Assessment (EIPA) is a tool that evaluates the voice-to-sign and sign-to-voice skills of interpreters who work in the elementary and secondary school classroom setting.

You asked about interpreting requirements in neighboring states. Delaware, Pennsylvania, Virginia and West Virginia maintain a certain criteria for sign language interpreters to meet prior to receiving a work permit for remuneration. The scope of their requirements range from Delaware (educational settings only) to Pennsylvania and West Virginia (comprehensive--in nearly all settings).

Multiple states have either begun the process or have incorporated higher standards for educational interpreters with a minimum score of 4.0 which is supported by the following states: Delaware, Kentucky, Arkansas, California, Minnesota, Kansas, New Mexico, Nevada, Rhode Island, Texas, and Utah. Other states are expected to follow as well.

For the EIPA scoring system, evaluators use a rating form to measure interpreters' skills and scores for each skill, ranging from 0 (no skills demonstrated) to 5 (advanced native-like skills). In the EIPA's ranking system, Level 3 is noted as "an interpreter at this level needs continued supervision and should be required to participate in continuing education in interpreting," while levels 4 and 5 are noted to have more competency for keeping up quality work in the classroom.

EIPA [officially recommends](#) a score of 4.0 as a minimum qualification for the interpreter. Those who have achieved such a score can be certified by the RID.

A significant reason for the recommended minimum score of 4.0 is due to the Idaho Educational Interpreter Interagency Consortium (EIIC)'s recent study which has concluded that the 4.0 score is equivalent to the interpreter being able to convey only 80% of the classroom information. You may need to determine how much absence of the classroom information the state is willing to sanction and whether the state is prepared to endorse a standard lower than the minimum established by the testing authorities.

It is important to make a distinction between EIPA scores and RID certifications. While the RID certification requires interpreters to also adhere to their confidentiality and ethics guidelines, EIPA merely assesses the interpreter's ability.

HB794 mentions certification levels which are neither consistent with RID nor EIPA and should be stricken.

The number of hours as referenced in this section suggests 40 and 80 hours of professional development. There will be less confusion if the number of professional development hours remain consistent with RID's requirement of 80 hours across four years, which is 20 hours per year. Technical edits as reflected below clarifies this particular requirement while maintaining the true intent of the initial draft.

Please see below for technical suggestions for the bill language. I must, however, emphasize that this letter does not represent an endorsement of HB794 on the part of this administration.

Technical suggestions are as follows:

Section 6-704.2

- Edit B2I.2 (line 3): **(2) "EDUCATIONAL INTERPRETER" MEANS AN INDIVIDUAL WHO PROVIDES SIGN LANGUAGE INTERPRETING SERVICES IN AN EDUCATIONAL SETTING. THIS INCLUDES THE CLASSROOM AND OTHER SCHOOL RELATED ACTIVITIES, INCLUDING EXTRACURRICULAR ACTIVITIES AND ANY OTHER ACTIVITIES THAT MAY BE IDENTIFIED IN THE STUDENT'S INDIVIDUALIZED EDUCATIONAL PROGRAM (IEP).**
 - This identifies the scope of the interpreter's work.

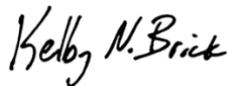
- Insert new definition after line 10: **(4) "SIGN LANGUAGE INTERPRETING" MEANS THE PROCESS OF CONVEYING INFORMATION BETWEEN AMERICAN SIGN LANGUAGE (ASL) AND ANOTHER LINGUISTIC FORM. THIS INCLUDES THE VARIOUS VISUAL SIGNING CODES OR SYSTEMS THAT ARE USED TO CONVEY LANGUAGE TO DEAF AND HARD OF HEARING INDIVIDUALS.**
 - This ensures that the scope is encompassing per legislative intent. School districts in others have taken a very narrow definition of sign language interpreter services and re-labeled their interpreters in other forms to avoid compliance. This includes new and creative labels such as sign language mediators or linguistic mediators.

- B2I.2 (line 20): **2. PASS ONE THE EIPA ASL PERFORMANCE TEST WITH A MINIMUM SCORE OF 3.7 4.0**
 - This change clarifies which EIPA test, seeing they have several different exams, such as their written test.

- The change in score has been previously explained.
- Insert new definition in B2.3I (line21): **3. CERTIFICATIONS GRANTED ON THE BASIS OF EIPA CREDENTIALS MUST IDENTIFY THE GRADE LEVELS THAT THE TEST SCORES WERE GRANTED FOR. INTERPRETERS CAN ONLY INTERPRET AT THOSE GRADE LEVELS.**
 - EIPA currently tests for scores in separate elementary and secondary grade levels. Scores of testing at one set of grade levels does not indicate qualifications for scores of testing at another set of grade levels.
- B2II (lines 21-23): **(II) HOLD A CURRENT NATIONAL INTERPRETER CERTIFICATION AS RECOGNIZED BY FROM THE REGISTRY OF INTERPRETERS FOR THE DEAF, OR ITS SUCCESSOR ORGANIZATION**
 - Current bill language specifies only one certification while the new language will recognize other current certifications including Certified Deaf Interpreters.
- B3I (lines 24-32):
 - **(3) IN ADDITION TO ANY OTHER RENEWAL REQUIREMENTS SET BY THE STATE BOARD AND THE BOARD UNDER THIS SUBTITLE, TO QUALIFY FOR RENEWAL OF A MARYLAND EDUCATIONAL INTERPRETER CERTIFICATION, THE REGISTRY OF INTERPRETERS FOR THE DEAF CERTIFICATE, A CERTIFIED EDUCATIONAL INTERPRETER SHALL SUCCESSFULLY COMPLETE DURING THE TERM OF THE CERTIFICATE:**
 - **(I) A MINIMUM OF 4020 HOURS ANNUALLY OF PROFESSIONAL DEVELOPMENT AS APPROVED BY THE REGISTRY OF INTERPRETERS FOR THE DEAF, OR ITS SUCCESSOR ORGANIZATION FOR A LEVEL ONE CERTIFICATION; OR**
 - **(II) A MINIMUM OF 80 HOURS OF PROFESSIONAL DEVELOPMENT FOR A LEVEL TWO OR LEVEL THREE CERTIFICATION.**
- 4C (lines 5-6): **AN EDUCATIONAL INTERPRETER EMPLOYED BY A PUBLIC SCHOOL SHALL OBTAIN CERTIFICATION ON OR BEFORE JULY 1, 2027 2022.**
 - A 2027 requirement will essentially sanction the ongoing isolation and language deprivation of current Deaf and hard of hearing students.

Please do not hesitate to contact our office if you have any further questions. Thank you for the important work you do for the Deaf and hard of hearing community in Maryland.

Warmly,



Kelby Brick

Director, Maryland Governor's Office of the Deaf and Hard of Hearing