

February 24, 2026

Potomac Chapter of the Registry of Interpreters for the Deaf, Inc. (PCRID)

500 Thayer Center STE C
Oakland, Maryland, 21550
liaison@pcrid.org
pcrid.org

To Chair Feldman, Vice Chair Kagan, and Members of the Committee,

The Potomac Chapter of the Registry of Interpreters for the Deaf (PCRID) is the local affiliate chapter of the Registry of Interpreters for the Deaf, the national professional association of American Sign Language interpreters. We represent interpreters living and working in Maryland, Washington, DC, and Northern Virginia. PCRID, along with the Maryland Association of the Deaf (MDAD), was part of the original working group that crafted Maryland's Sign Language Interpreter Licensure law.

This law and the creation of the State Board of Sign Language Interpreters are critical to establishing minimum standards for sign language interpreters in Maryland and to providing a path for resolving ethical and quality complaints from consumers. Sign language interpreting as a profession remains relatively young. While our national organization was founded in 1964, and the profession expanded significantly following passage of the Americans with Disabilities Act, interpreter licensure itself is even more recent, with most state frameworks emerging only in the early 2000s. There is no longstanding scaffolding for what interpreter licensure "should" look like. Maryland's law was intentionally written to be one of the most comprehensive in the country; balancing consumer protection, enforceable standards, restorative options, and pathways for professional development.

Over the past two years, implementation has presented challenges. These challenges are not unexpected given the novelty of interpreter licensure nationwide and the absence of established regulatory models. Senate Bill 645 is an attempt to address concerns raised during the initial implementation period. PCRID shares the sponsors' goal of strengthening the law and ensuring its success. With the amendments submitted by Senator King, we are in favor of the majority of the bill. However, it is the opinion of the PCRID Executive Board that one of the key provisions in SB645 creates new structural concerns rather than resolving existing ones. Accordingly, PCRID supports SB645 only with the amendment outlined below.

Board Composition – Section 9–2411

Interpreter licensure is unlike licensure of many other professions. Interpreters are present in every aspect of Deaf individuals’ lives—medical, legal, educational, employment, civic, and personal settings. Deaf consumers are uniquely positioned to evaluate interpreter performance because they are the only stakeholders who experience interpreters across all these domains. For that reason, Deaf consumer leadership on the Board is essential.

We are concerned about the proposed addition in §9–2411(a)(2)(VI) of two seats for individuals “affiliated with an entity that operates and implements Deaf services in an educational, legal, or medical setting.”

Historically, some of these entities opposed interpreter licensure and have also been among the largest procurers of unqualified interpreters—circumstances that contributed to the need for licensure in the first place. Introducing two seats tied to affiliated entities creates a new power dynamic on an 11-member Board and risks shifting regulatory authority away from Deaf consumers and licensed practitioners.

The term “affiliated” is also ambiguous and may permit appointment of individuals who are hearing, non-signing, and not meaningfully connected to Deaf community experience. This ambiguity risks undermining the Board’s intended expertise and community grounding. We are not in favor of these seats being added to the Board.

If these seats remain, we strongly recommend clarifying statutory language to ensure:

- Clear qualification standards, including experience providing interpreting services and ASL proficiency where appropriate.

We note that the State Board of Sign Language Interpreters is the only licensure board in Maryland composed entirely of members representing historically marginalized communities (Deaf, DeafBlind, and interpreters). Adding additional structural dilution that is not imposed on comparable boards risks undermining confidence in the regulatory process.



Implementation Timeline

We acknowledge the extension of the full licensure requirement to July 1, 2027. While we understand the rationale for additional implementation time, we caution that prolonged timelines may unintentionally delay consumer protections that were the foundation of the original law.

Conclusion

Licensure is a public trust mechanism. Using a simple analogy: if licensure is a seat belt, the danger of poorly designed licensure is greater than no licensure at all—because the public will believe protection is in place. Deaf Marylanders must be able to trust that the Board charged with regulating interpreters is structured in a way that centers Deaf expertise, protects against conflicts of interest, and operates transparently.

For these reasons, PCRID respectfully requests an unfavorable report on SB645 unless the amendment described above is adopted. We remain committed to working collaboratively with the sponsors, stakeholders, and the Committee to ensure Maryland's interpreter licensure framework remains strong, equitable, and effective.

Respectfully submitted,

Shelby Abdilah, PCRID Liaison

On behalf of the PCRID Executive Board



Sincerely,

[NAME]

[PCRID TITLE]

Potomac Chapter of the Registry of Interpreters for the Deaf

On behalf of the PCRID Board of Directors and Community