

**MDOD\_S0645\_FAV\_EEE\_2026.2.24.docx.pdf**

Uploaded by: Anne Blackfield

Position: FAV



**BILL: SB 645**  
**POSITION: FAV – Favorable**  
**COMMITTEE: Education, Energy, and the Environment**  
**DATE: February 24, 2026**

**SUBMITTED BY:** Maryland Department of Disabilities  
217 East Redwood Street, Suite 1300, Baltimore, MD 21202

Dear Chair Feldman and Committee Members,

The Maryland Department of Disabilities (MDOD) is pleased to submit this letter of support for **SB 645, State Board of Sign Language Interpreters – Membership**. This legislation updates the structure, requirements, and deadlines for the State Board of Sign Language Interpreters (“the Board”).

SB 645 adds a seat for MDOD to the Board and includes MDOD in the process of developing regulations for interpreter certification. MDOD recognizes the tremendous amount of time and energy the current Board members have put into carrying out the Board’s statutory mandate to date, and we are honored to be included in this work moving forward.

MDOD has a deep interest in the delivery of consumer-oriented, high-quality ASL services. MDOD houses the Telecommunications Access of Maryland (TAM) Program, which oversees the delivery of statewide Maryland Relay services (including Video Relay Services) that provide the Deaf, Deafblind, and hard of hearing communities with accessible telecommunications and teleconferencing services. TAM also has a Communication Facilitator Service, which focuses on meeting the highly individualized communications needs of Deafblind individuals. ASL is not only a critical feature of TAM’s work, many of TAM’s staff are themselves ASL users and they look forward to offering their combination of lived experience and professional expertise to the work of the Board.

Thank you for your consideration. MDOD respectfully requests a **favorable report on SB 645**.

Sincerely,

A handwritten signature in cursive script that reads "Carol A. Beatty".

Carol A. Beatty  
Secretary, Department of Disabilities

**SB645\_USM\_FWA.pdf**

Uploaded by: Andy Clark

Position: FWA



**SENATE EDUCATION, ENERGY, AND THE ENVIRONMENT COMMITTEE**  
**Senate Bill 645**  
**State Board of Sign Language Interpreters - Membership and Licensing**  
**February 26, 2026**  
**Favorable with Amendment**

Chair Feldman, Vice Chair Kagan and members of the committee, thank you for the opportunity to offer testimony on Senate Bill 645. The bill seeks to expand and restructure the State Board of Sign Language Interpreters, broaden representation to include underrepresented Deaf, DeafBlind, and interpreter communities, require proactive outreach in the nomination process, and extend the deadline for establishing licensing requirements to December 31, 2026. It also establishes July 1, 2027 as the date by which interpreters must meet new licensing requirements.

The University System of Maryland (USM) is comprised of twelve distinguished institutions, and three regional centers. We award eight out of every ten bachelor's degrees in the State. Each of USM's 12 institutions has a distinct and unique approach to the mission of educating students and promoting the economic, intellectual, and cultural growth of its surrounding community. These institutions are located throughout the state, from Western Maryland to the Eastern Shore, with the flagship campus in the Washington suburbs. The USM includes three Historically Black Institutions, comprehensive institutions and research universities, and the country's largest public online institution.

The USM deeply appreciates the bill's intention and thanks the Maryland Hospital Association for including us in the advocacy around this important issue. Raising standards, expanding representation, and strengthening accountability are goals we all share.

Each USM institution relies heavily on high-quality, campus-embedded interpreters and interpreter-training pathways to fulfill federal ADA obligations and to support Deaf and hard-of-hearing students, faculty, staff, and community partners. Currently, USM institutions face difficulty recruiting and retaining qualified interpreters, particularly for specialized academic disciplines. With suggested amendments, this law would promote consistency while not unintentionally narrowing the available pool of interpreters and increasing costs or delays in service provision. Any disruption to interpreter availability, particularly during a statewide interpreter shortage, may impact the very communities Senate Bill 645 aims to support.

Also, we appreciate the commitment to establishing professional standards for sign language interpreters in Maryland and are grateful for the proposed amendments that would help ensure the new law does not create significant challenges for colleges and universities that

rely on interpreters to ensure communication access for Deaf and Hard of Hearing students, faculty, staff, and visitors.

USM supports Senate Bill 645's goals of inclusivity, accountability, and professionalization, and respectfully urge the Committee to ensure that Senate Bill 645 is implemented in partnership with higher-education institutions, Deaf-community leaders, interpreter-training faculty, disability-services professionals, and the statewide network of interpreters.

The USM appreciates the opportunity to provide this testimony regarding Senate Bill 645.



**SB645\_MSEA\_Woodward\_FWA.pdf**

Uploaded by: Anzer Nikki Woodward

Position: FWA

**FAVORABLE WITH AMENDMENTS**  
**Senate Bill 645**  
**State Board of Sign Language Interpreters – Membership and Licensing**

**Senate Committee on Education, Energy, and the Environment**  
**February 26, 2026**

**Dr. Nikki Woodward**  
**Vice President**

The Maryland State Education Association supports, with amendments, Senate Bill 645, which would expand the membership of the State Board of Sign Language Interpreters (SBSLI) and require the nomination process to include outreach to underrepresented deaf, deafblind, and interpreter communities. It would also alter the dates by which the Board must establish certain licensing requirements and by which sign language interpreters must meet certain licensing requirements. Importantly, it would require the SBSLI's promulgation process to include a report to the Governor and General Assembly on our state's interpreter workforce and, as amended by the sponsor, add experience-based pathways to licensure.

MSEA represents 76,000 educators and school employees who work in Maryland's public schools, teaching and preparing our almost 900,000 students so they can pursue their dreams. MSEA also represents 44 local affiliates in every county across the state of Maryland, and our parent affiliate is the 3-million-member National Education Association (NEA).

MSEA is proud to represent educational interpreters across our state, and we share the sponsor's goal of ensuring access to qualified interpreters for all who benefit from their services. We appreciate that this bill seeks to revise portions of the law that are likely to pose barriers to qualified and experienced educational interpreters serving students and families. Many of those services are essential to both educational equity and compliance with federal law: the Individuals with Disabilities Education Act (IDEA), the Americans with Disabilities Act (ADA), and Section 504 of the Rehabilitation Act.<sup>1</sup>

We believe that the following amendments would strengthen this bill and support our state's commitment to a well-staffed and highly qualified interpreter workforce:

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<sup>1</sup> NAD – Section 504 and ADA – Obligations of Public Schools. <https://www.nad.org/resources/education/k-12-education/section-504-and-ada-obligations-of-public-schools/>

## Implementation timeline

- **Deadline to establish licensure requirements:** In §9-2414(a)(2), revise the date by which the Board is required to establish and publish licensure requirements from December 31, 2026 to **July 1, 2027** to ensure adequate time for a review of workforce data, public comment, and evaluation by the Joint Committee on Administrative, Executive, and Legislative Review (AELR).
- **Deadline to meet licensure requirements:** In Section 4, adjust the date by which interpreters must achieve licensure from July 1, 2027 to **July 1, 2028** to provide adequate time for the SBSLI to communicate the newly established requirements to interpreters and allow interpreters to obtain the necessary credentials, gather documentation, and complete the application process. This is especially important if the final requirements include licensure tests like the Educational Interpreter Performance Assessment (EIPA), for which scoring can take up to a year.<sup>2</sup> We strongly advise that the deadline is in July rather than January to avoid the potential disruption of new requirements taking effect mid-school year.

## Workforce considerations

- **Adding county-by-county data:** Specify in §9-2407 that the SBSLI's report should include the number of licensed interpreters **by county**, not just statewide. This context is important to ensure that counties with fewer licensed interpreters will not be disproportionately impacted by the newly established regulations.
- **Welcoming licensed interpreters from out of state:** Ensure that Maryland can seamlessly recruit licensed interpreters from other states by replacing “may” in §9-2420(a) with “shall” and striking the additional conditions placed on out-of-state applicants in §9-2420(b)(2) and (c).

## Licensure requirements

- **Recognizing years of service:** We appreciate the sponsor's commitment to adding an amendment that expands pathways to a provisional license by replacing “and” with “or” in §9-2419(3)(i). This change allows the SBSLI to recognize the successful long-term service of an interpreter toward meeting their licensure requirements.
- **Streamlining provisional licensure:** Strike §9-2425(c), which adds provisional license restrictions that create ambiguity about educational interpreters' ability to serve in settings with legal components, like Individualized Education Plan (IEP) meetings.

**With these amendments, we would ask the committee for a favorable report.**

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<sup>2</sup> Announcements – EIPA Classroom Interpreting. <https://classroominterpreting.org/announcements>

**SB0645 letter.pdf**

Uploaded by: David Alianiello

Position: FWA

Dear Chair and Members of the Committee,

My name is David Alianiello, and I am submitting this written testimony as a concerned educator who has spent over 15 years in the service of children who are Deaf or Hard of Hearing (DHH). Having worked in two major public-school systems in the state of Maryland as an educator of deaf/hard of hearing children and a supervisor of sign language interpreters.

I am writing to formally express my support for **SB 0645**. The Public School Superintendent's Association of Maryland (PSSAM) and the Maryland Association of Boards of Education (MABE) will be putting forth amendments as well and I support their amendments. Since the passage of Maryland Sign Language Interpreters Act in 2023, we have worked collectively to bring forward impacts on local school systems in support of the development of regulations. We need to ensure that the pieces are correct before we move forward with enacting this law. The changes proposed within this bill and the additional amendments that PSSAM and MABE will be proposing will help make this law effective.

I strongly believe in licensure for sign language interpreters, but we need to make sure we have qualified people involved in this process to make sure that the regulations are fair, sensible and have the intended effect of providing access to deaf/hard of hearing people in the state of Maryland.

Thank you,

David Alianiello

**SB0645 SWA.pdf**

Uploaded by: Grace Wilson

Position: FWA



## SB0645 – STATE BOARD OF SIGN LANGUAGE INTERPRETERS – MEMBERSHIP AND LICENSING

February 26, 2026

EDUCATION, ENERGY, AND THE ENVIRONMENT

### SUPPORT WITH AMENDMENTS

Grace Wilson, Director of Legislation & Policy (410.440.1758)

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Anne Arundel County Public Schools (AACPS) supports with amendments **SB0645 – State Board of Sign Language Interpreters – Membership and Licensing**. This bill expands the membership of the State Board of Sign Language Interpreters (Board) and delays the date by which sign language interpreters must meet licensing requirements from July 1, 2024, to December 31, 2026.

The federal Americans with Disabilities Act requires that State and local governments, including county boards of education, communicate effectively with people who have communication disabilities, including deaf, hard of hearing, and deaf-blind individuals. Under federal law, county boards are required to provide auxiliary aids and services when needed to communicate effectively with individuals with a communication disability. For individuals who are deaf, hard of hearing, or deaf-blind, this includes providing sign language interpretation services.

AACPS supports the licensure of sign language interpreters in Maryland to ensure that students and parents/guardians have access to high-quality sign language interpretation services, thus ensuring equitable access and opportunity to participate in the educational program. However, amendments are necessary to ensure that this legislation does not result in a shortage of certified interpreters in the State and subsequent denial of educational services for deaf, hard of hearing, and deaf-blind students and parents/guardians. AACPS supports the amendments proposed by the Public School Superintendent's Association of Maryland.

#### Licensure Timeline

As written, SB0645 becomes effective October 1, 2026, the State Board of Sign Language Interpreters is required to publish regulations by December 1, 2026, and the licensure requirements established in regulation become effective July 1, 2027. Given the proposed changes to the composition of the Board, it is unlikely that the Board will be able to convene and promulgate regulations by the end of 2026. Additionally, six months between regulation adoption and the implementation of licensure requirements is insufficient to allow individuals to seek and obtain licensure, even the provisional licensure established in current law. AACPS employs a limited number of sign language interpreters and utilizes interpretation agencies to provide sign language interpretation services to our students and parents/guardians. Insufficient time to meet the licensure requirements established by the Board creates the potential for deaf, hard of hearing, and deaf-blind students and parents/guardians to be denied access to the educational program due to a lack of qualified interpreters in the State. High quality interpretation should not come at the expense of access to educational services for our students. The framework for licensure of sign language interpreters in Maryland must create viable pathways for interpreters working in the educational setting to pursue certification, while still providing interpretation services to our students and parents/guardians.

#### Educational Representation

Given the interest that has been expressed by the Board regarding certifying interpreters in the educational setting, AACPS believes that educational institutions should be recognized in the Board's composition and as a specialty area in §9-2414 of the State Government Article. Local school systems have federal and State obligations to provide for

the education of students, representation on the Board ensures that licensure requirements will not conflict with these obligations.

### Consumer Choice

AACPS supports consumer choice regarding sign language interpretation services but is also cognizant of the constraints that currently exist regarding the provision of sign language interpretation services. While AACPS relies on both staff sign language interpreters and agency interpreters to meet the needs of students and parent/guardians, it is not always feasible to obtain in person interpretation services when requested. It is important that there is flexibility to provide interpretation services through a non-preferred delivery method to ensure that State licensure requirements do not conflict the federal and State legal obligations of school systems to students, such as the requirements of the Individuals with Disabilities Education Act. AACPS proposes that §9-2415 of the State Government Article be amended to require that interpretation services be provided in the method preferred by the deaf, hard of hearing, or deaf-blind individual to the extent practicable.

Accordingly, AACPS respectfully requests a **FAVORABLE WITH AMENDMENTS** committee report on SB0645.

# **SB 645- State Board of Sign Language Interpreters**

Uploaded by: Jake Whitaker

Position: FWA



Maryland  
Hospital Association

## **Senate Bill 645- State Board of Sign Language Interpreters - Membership and Licensing**

### **Position: *Support with Amendments***

February 25, 2026

Senate Education, Energy and the Environment Committee

### **MHA Position**

On behalf of the Maryland Hospital Association's (MHA) member hospitals and health systems, we appreciate the opportunity to comment in support with amendments of Senate Bill 645. Maryland hospitals and health systems strongly support a formal licensure process to ensure highly qualified sign language interpreters are available across the state, as effective communication is a critical component of clinical safety and high-quality care for Deaf and hard of hearing individuals. We share the sponsor's commitment to licensure for Maryland sign language interpreters, and we recognize that SB 645 provides a necessary statutory framework to operationalize licensure and address the implementation hurdles associated with the 2023 Sign Language Interpreters Act.

To ensure this framework can be successfully implemented within the health care delivery system, we respectfully submit the following targeted amendments. Any regulatory reforms must be considered in light of practical realities, including a severe statewide shortage of interpreters and the significant administrative time it will take to form a new Board, promulgate regulations, and establish the licensure process.

There are approximately 500 certified sign language interpreters available in Maryland to serve a Deaf and hard of hearing population of approximately 1.2 million. This extreme supply and demand imbalance is not evenly distributed, as this limited workforce is heavily concentrated in the Baltimore and Washington metropolitan corridor. A strict in-person mandate disproportionately impacts rural hospitals, such as those on the Eastern Shore or in Western Maryland and the patients who reside in those communities.

Because of these constraints, advancing rigid statutory mandates could ultimately delay critical care for Deaf and hard of hearing patients. Maryland would be an outlier by requiring strict consumer choice requirements for in-person interpretation services. No other state in the nation has enacted such a high and inflexible standard. Given the limited supply of interpreters in the state, we respectfully caution that implementing this mandate could delay access to critical services for the very community it is designed to support. The proposed amendments are designed to balance the need to deliver timely care with the desire to provide the best interpreter services available.

Additionally, hospitals are bound by the federal Emergency Medical Treatment and Labor Act (EMTALA), which requires the immediate screening and stabilization of any patient presenting

to the emergency department. If a patient who is Deaf arrives with symptoms of a time-sensitive emergency, such as a stroke, severe trauma, or heart attack, the hospital is federally mandated to treat them immediately. In these critical moments, delaying these health services to wait for an in-person interpreter to travel to the facility is clinically dangerous and in violation of EMTALA. Without legally protected access to instant video remote interpreting (VRI), state law would penalize hospitals for utilizing remote interpreters, while federal law would penalize them for delaying life-saving care to wait for an on-site interpreter. Our proposed amendments resolve this conflict by ensuring VRI remains a protected clinical tool when timely communication is essential to patient care.

Finally, interpreters are in high demand nationwide. Maryland risks losing access to critical out of state VRI interpreters without a measured approach to these regulations. Maryland should preserve reciprocity for interpreters under a framework that ensures access to quality services.

MHA is committed to working collaboratively with the sponsor and the Committee to achieve a workable licensure framework. These amendments will strengthen the bill and ensure continued access to equitable care while protecting patients' ability to receive high-quality interpreter services.

For these reasons, we request a favorable with amendments report on SB 645.

For more information, please contact:

Jake Whitaker, Assistant Vice President, Government Affairs & Policy  
Jwhitaker@mhaonline.org

## **Proposed Amendments and Rationale**

### **Amendment 1:**

Strike §9–2411(a)(2)(vi), and replace it with the following:

"THREE SHALL BE AFFILIATED WITH ENTITIES THAT OPERATE AND IMPLEMENT DEAF SERVICES, INCLUDING ONE IN AN EDUCATIONAL SETTING, ONE IN A LEGAL SETTING, AND ONE IN A MEDICAL SETTING"

**Explanation:** This will ensure that there is adequate representation from three fields providing essential services.

### **Amendment 2:**

Update existing reporting requirements for the Board (§9–2407) by adding:

(6) THE NUMBER OF LICENSED SIGN LANGUAGE INTERPRETERS IN EACH COUNTY.

**Explanation:** This will strengthen any future policies or regulatory action/updates by ensuring that there is an accurate understanding of the number of available interpreters across different jurisdictions in the State.

**Amendment 3:**

In §9–2414, revise date of establishment and publication of licensing requirements from December 31, 2026 to JULY 1, 2027.

**Explanation:** Given the proposed changes to the Board composition, it is unlikely that the Board will be able to convene and promulgate updated regulations before the end of the year.

**Amendment 4 (Consumer choice requirement):**

Modify §9–2415(C)(3) as follows:

(C) The Board shall adopt regulations to:

ALLOW DEAF AND HARD OF HEARING INDIVIDUALS TO **INDICATE** WHETHER THEY PREFER SIGN LANGUAGE INTEPRETATION SERVICES BEING PROVIDED IN A VIDEO REMOTE INTERPRETING SETTING OR THROUGH IN-PERSON INTERPRETING **AND REQUIRE EMPLOYERS TO PROVIDE REASONABLE ACCOMMODATIONS TO SUPPORT THIS PREFERENCE TO THE EXTENT PRACTICABLE.**

**Explanation:** While we support the goal of providing consumer choice, a strict consumer choice requirement is impractical given the limited number of interpreters in Maryland. In certain counties/jurisdictions, it would be virtually impossible for employers to consistently meet this requirement.

**Amendments 5 and 6:**

Modify §9–2415(C)(1) and §9–2415(C)(4):

(C) The Board shall adopt regulations to:

(1) govern sign language interpretation services provided in a video remote interpreting setting **BY INTERPRETERS LOCATED IN THE STATE;**

(4) provide sign language interpretation services provided in a video remote interpreting setting **BY INTERPRETERS LOCATED IN THE STATE;**

Add subsection §9-2418(b)(3):

(b) This section does not apply to an individual who:

(3) PROVIDES SIGN LANGUAGE INTERPRETATION SERVICES AS PART OF A VIDEO REMOTE INTERPRETING SERVICE, HOLDS A RID OR BEI CERTIFICATION, AND IS LOCATED OUT-OF-STATE;

**Explanation:**

Often those providing virtual/remote interpreting services are located in other states. Many in-person interpreters offering services to Maryland residents may also be located in neighboring states. Requiring them to go through the licensure process in Maryland may discourage these providers from offering their services to Maryland residents. This seems especially likely since some neighboring states (DC, Pennsylvania) do not currently require a license for interpreters. However, while requiring all video remote interpreters (especially out-of-state VRI) to be licensed presents operational challenges, we also believe that simply waiving all requirements for VRI providers would essentially undermine the purpose of this bill as a significant portion of interpreting services provided in this state are done remotely.

**Amendment 7:**

Modify §9-2420(a) and (b) and delete §9-2420(c):

- (a) Subject to the provisions of this section, the Board ~~may~~ SHALL waive any requirement of this part for an applicant who is licensed to provide sign language interpretation services in another state.
- b) The Board may grant a waiver under this section only if the applicant:
  - (1) pays to the Board:
    - (i) the nonrefundable application fee set by the Board; and
    - (ii) the license fee set by the Board; and
  - ~~(2) provides satisfactory evidence that, at the time the applicant was licensed in the other state, the applicant was required to meet the qualifications for licensure that were substantially equivalent to the qualifications in the State.~~
- ~~(c) The Board may grant a waiver under this section only if the state in which the applicant is licensed waives the qualifications of licensees of the State to a similar extent as the State waives the qualification requirements for individuals licensed in that state.~~

**Explanation:**

This amendment changes §9-2420(a) so that the Board must waive the requirements for someone who is already licensed to provide sign language interpretation services in another state.

The amendment also removes (b) that states that licensure requirements must be substantially similar in other states. It also removes §9-2420(c), which currently requires that the other state offer the same kind of waiver back to Maryland. Without that reciprocity rule, the Board can more easily recognize out of -state licenses. Overall, the goal is to make it simpler for qualified interpreters from other states to be permitted- to provide interpreting services in Maryland.

**Amendment 8:**

Revise date by which interpreters need to be licensed from July 1, 2027 to JANUARY 1, 2028.

**Explanation:** This change is to accommodate the change in the date by which licensing requirements need to be established and published.

# **LBH FWA Senate Bill 645 – State Board of Sign Lang**

Uploaded by: Jennifer Witten

Position: FWA



February 26, 2026

Senate Bill 645 – State Board of Sign Language Interpreters – Membership and Licensing  
Education, Energy, and the Environment Committee

Position: Favorable with Amendments

Dear Chairman Feldman and Committee Members,  
LifeBridge Health strongly supports the General Assembly's continued commitment to ensuring that deaf and hard of hearing individuals across Maryland have access to competent, qualified sign language interpreters. The Maryland Sign Language Interpreters Act (2023) established an important framework to professionalize and strengthen interpreter standards statewide. SB 645 builds upon that foundation by expanding the membership of the State Board of Sign Language Interpreters and refining implementation timelines to support a workable licensing structure.

As a regional health system serving diverse communities across Maryland, LifeBridge Health provides interpretation services across multiple hospitals, emergency departments, outpatient centers, and specialty care sites. We contract with qualified vendors for both in-person and video remote interpreting (VRI) services and ensure interpreters meet nationally recognized certification standards, including Registry of Interpreters for the Deaf (RID), National Association of the Deaf (NAD), and Board of Evaluation of Interpreters (BEI) criteria.

We support SB 645's proposed structural improvements to the Board. Expanding Board membership to include stakeholders that work with ASL providers with experience in medical, legal, and educational settings will strengthen regulatory decision-making and ensure that implementation reflects the realities of high-demand service environments. However, to ensure the Act is workable in healthcare settings and aligned with federal law, we respectfully request adoption of the amendments proposed by the Maryland Hospital Association.

The Act directs the Board to adopt regulations allowing deaf and hard of hearing individuals to determine whether they prefer VRI, in-person interpreting, or other supportive services when practicable. In hospital and emergency care environments, this approach is operationally challenging and inconsistent with the federal Americans with Disabilities Act (ADA). Under the ADA, covered entities may use either qualified on-site interpreters or VRI, provided the method selected ensures effective communication. VRI systems must meet technical performance standards, including real-time, full-motion video and clear audio transmission. The narrow current approach may delay critical care when time is limited during emergency situations.

Maryland faces a significant shortage of certified ASL interpreters. Hospitals frequently experience multi-hour wait times often three to five hours in urban areas and significantly longer in rural areas for in-person interpreter availability. Emergency departments cannot delay treatment while awaiting an on-site interpreter and limiting VRI use to narrowly defined emergencies or short timeframes would disrupt patient care and create access barriers.



SB 645 should be amended to require rather than merely permit—the Board to waive licensing requirements for interpreters licensed in other states with substantially equivalent qualifications.

Healthcare systems across Maryland routinely rely on out-of-state interpreters, particularly for VRI services, due to the limited in-state workforce. Many of these professionals already hold RID, NAD, or BEI certifications that form the basis of Maryland’s licensing framework.

Absent a clear and mandatory reciprocity pathway, highly qualified interpreters may decline to provide services in Maryland because of duplicative licensing requirements, further exacerbating the workforce shortage. Replacing “may” with “shall” in §9-2420(a) will create a predictable, commonsense pathway that protects quality while preserving access.

SB 645 appropriately extends the deadline for the Board to establish and publish licensing requirements. Given the addition of new Board members and the substantial regulatory steps required including drafting regulations, public comment, final adoption, application development, and processing additional time is necessary to ensure thoughtful implementation.

We recommend extending the deadline for publishing licensing requirements to July 1, 2027, and correspondingly extending the date by which interpreters must be licensed to January 1, 2028. This timeline better reflects administrative realities and avoids unintended service disruptions.

LifeBridge Health is committed to ensuring meaningful access to care for deaf and hard of hearing patients. SB 645 advances that goal, and with the proposed amendments, it will create a regulatory framework that is legally sound, operationally feasible, and responsive to Maryland’s interpreter workforce capacity. For these reasons, we respectfully request a favorable report on SB 645 with the adoption of the Maryland Hospital Association amendments. Thank you for your consideration.

Respectfully,

Jennifer Witten, Vice President Government Affairs

[Jwitten2@lifebridgehealth.org](mailto:Jwitten2@lifebridgehealth.org) 505-688-3495

Address: 2401 W Belvedere Ave, Baltimore, MD 21215

**MDAD Written Testimony SB 645.pdf**

Uploaded by: MDAD President MDAD President

Position: FWA



**Maryland Association of the Deaf  
Written Testimony**

**SB 645 - State Board Sign Language Interpreters - Membership and Licensing  
Thursday, February 26, 2026  
Position: Favorable with Amendments**

The Maryland Association of the Deaf (MDAD) is a statewide organization dedicated to protecting and advancing the interests of Deaf, DeafBlind, and Hard of Hearing Marylanders in matters of accessibility, equity, and civil rights. Currently, approximately 1.2 million individuals in Maryland identify within these communities.

MDAD writes to express its support for SB 645, sponsored by Senator King, regarding the State Board of Sign Language Interpreters — Membership and Licensing, along with the amendments offered by Senator King and the amendment proposed below.

Establishing a licensure requirement is critically important to protect consumers and to elevate the interpreting profession through clear, enforceable, and meaningful standards.

However, MDAD has concerns regarding the inclusion of implementing agencies as voting members of the Board. Granting decision-making authority to agencies that do not possess direct experience or specialized knowledge of interpreters' professional practice may undermine the purpose and integrity of licensure. Interpreters and members of the Deaf, DeafBlind, and Hard of Hearing community experience firsthand the impact of interpreting services and are uniquely positioned to inform standards, ethics, and professional accountability.

With respect to affiliated and/or implementing agencies (excluding ex officio members), we recommend that appointed representatives be certified or licensed interpreters, or individuals with demonstrated professional experience working with interpreters or Deaf individuals. Additionally, such representatives should demonstrate proficiency in American Sign Language to ensure informed and culturally competent decision-making.

The additional amendments that we want:

**(VI) TWO SHALL BE AFFILIATED WITH AN ENTITY THAT OPERATES AND IMPLEMENT ~~DEAF~~ SERVICES IN AN EDUCATIONAL, LEGAL, OR MEDICAL SETTING WHO ARE INTERPRETERS OR HAVE PROFESSIONAL EXPERIENCE WORKING WITH INTERPETERS OR A DEAF PERSON;**

**(2) EXCEPT FOR THE EX OFFICIO MEMBERS ~~AND THE MEMBERS UNDER SUBSECTIONS (A)(2)(VI) OF THIS SECTION~~, be proficient in American Sign Language.**

Upon the recommendation and appointment of qualified representatives, all Board members would hold equal status and responsibility in carrying out the Board's duties.

As a reminder, the purpose of establishing this licensure requirement is to protect consumers and to strengthen the integrity of the interpreting profession. With these considerations in mind, MDAD respectfully requests a favorable report on SB 645, inclusive of the amendments offered by Senator King and the amendments proposed in this testimony.

Thank you,

MDAD Board of Directors

**Sb0645\_hb1192.pdf**

Uploaded by: Michelle Morales

Position: FWA

Michelle Morales, EdD  
February 26, 2026 at 1:00 PM

Regarding **SB0645** (HB1192) - *State Board of Sign Language Interpreters - Membership and Licensing*

Dear members of the Education, Energy, and the Environment Committee,

I want to thank Chair Feldman, Vice Chair Kagan, and the members of the Education, Energy, and the Environment Committee for this opportunity to present my written testimony regarding SB0645 (HB1192).

I want to thank all who were involved in the amendment of this State Board of Sign Language Interpreters law. Thank you for listening.

I **support** SB0645 (HB1192) with **amendments**.

page 2, line 3 (i) one shall be a member of the Maryland Association of the Deaf; and page 5; line 19 (II) THE MARYLAND ASSOCIATION OF THE DEAF; (**note**: Maryland Association of the Deaf [MDAD] ***does not*** represent deaf Marylanders. MDAD claimed that they represent 1.2 million DHH people in MD, that is misinformation. As far as I know, they have not visited the DHH community on the eastern shore. They declined the invitation from western MD. MDAD is not inclusive of BIPOC DHH, DHH of different social economic status, different communication modalities, late deafness, etc.). Since this bill affects **ALL** Deaf, DeafBlind, and Hard of Hearing people, here are my **amendments**; 1) remove Maryland Association of the Deaf from this bill and replace them with DDBHH individuals; **or** 2) contact the Director of the Governor's Office of Deaf and Hard of Hearing for the current list of associations, agencies, groups, and organizations of the DDBHH and recruit DDBHH individuals; **or** 3) keep MDAD and include all the other associations, agencies, groups, and organizations of the DDBHH in alphabetical order. See examples below)

Some examples of agencies, associations, groups, and or organizations of DDBHH in Maryland:

- Anne Arundel Deaf Group
- Any Deaf ministries
- Any mental health groups for DDBHH
- Chesapeake Bay Association of the Deaf
- Deaf Grassroots Movement - Maryland
- Deafnet (western Maryland)
- Deaf Independent Living Association (eastern shore)
- Eastern Shore for the Deaf Social (inactive due to pandemic, contact DILA [see above])
- Hearing Loss Association of America
- Howard County Association of the Deaf
- Interstate Association of the Deaf
- Latino Deaf and Hard of Hearing Association of the Metro DC Area

- Maryland/DC Hands & Voices
- Maryland Association of the Deaf
- Maryland Deaf Senior Citizens
- Metropolitan Washington Association of Deaf-Blind
- National Black Deaf Advocate
- Silent Orioles Club
- Washington Society of the Jewish Deaf
- ...and more

page 2, line 14 OPERATES AND IMPLEMENTS DEAF SERVICES IN AN EDUCATIONAL,...  
 (note: remove EDUCATIONAL. GODHH and SBSLI are not state education agencies. They do not have the knowledge and qualifications to properly oversee and support public K-12 personnel).

page 4, line 9 licensing requirements for sign language interpreting in all settings; (note: add “but not educational setting”. GODHH and SBSLI are not state education agencies. They do not have the knowledge and qualifications to properly oversee and support public K-12 personnel).

page 4, line 28 (8) any other specialist areas...(note: add “but not educational interpreter specialist area. GODHH and SBSLI are not state education agencies. They do not have the knowledge and qualifications to properly oversee and support public K-12 personnel).

page 5, lines 23, 24, 25, (VI) THE MARYLAND STATE DEPARTMENT OF EDUCATION; (VII) THE MARYLAND STATE EDUCATION ASSOCIATION; (VIII) THE PUBLIC SCHOOLS ASSOCIATION OF MARYLAND (notes: remove MSDE, MSEA, and PSAM. These groups have no subject matter expert staff who are DDBHH. They do not have the knowledge and qualifications regarding language and communication needs of DHH K-12 students and the educational interpreter field. They have not been responsive to contacts by the community who are DDBHH). “Nihil de no is sine no is” means “nothing about us without us”.

Again, I **support SB0645** (HB1192) with **amendments**. **Do not pass without amendment**.

As the Moore/Miller Administration says, “leave no one behind”.

Thank you,

Respectfully,

Michelle Morales, EdD

**Montgomery County Board of Education\_SB 645\_SWA.pd**

Uploaded by: Patricia Ursprung

Position: FWA



# MONTGOMERY COUNTY BOARD OF EDUCATION

*Expanding Opportunity and Unleashing Potential*

15 West Gude Drive ♦ Suite 100 ♦ Rockville, Maryland 20850

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**BILL:** Senate Bill 645

**TITLE:** State Board of Sign Language Interpreters - Membership and Licensing

**DATE:** February 26, 2026

**POSITION:** Support with Amendments

**COMMITTEE:** Education, Energy, and the Environment

**CONTACT:** Patricia Ursprung, Coordinator, Legislative Affairs

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The Montgomery County Board of Education (Board) supports Senate Bill 645 with several important amendments.

This bill alters the composition of the State Board of Sign Language Interpreters Board and proposes additional alterations to the Sign Language Interpreters Act, signed into law in 2023. These proposed revisions establish statewide licensure requirements for sign language interpreters, with licensing criteria finalized by December 31, 2026, and implementation beginning July 1, 2027. The bill regulates interpreters broadly, including those providing services in school settings, and allows applicants to qualify through certification or other Board-approved pathways. For Montgomery County Public Schools, this legislation has significant implications for workforce qualifications, labor agreements, compensation structures, recruitment, and service continuity for students who rely on educational interpreters.

While the Board supports the development of statewide professional standards, which may strengthen the quality and consistency of interpreting services provided to students and families, the Board is requesting that the committee consider some amendments that acknowledge the realities of providing interpreting services in the K-12 education setting.

The proposed conceptual amendments include:

- **Establish an education-specific licensure category for K–12 educational interpreters.** By not identifying Educational Interpreters as a distinct workforce group, there is a risk that K-12 implementation and pipeline challenges could be overlooked during the development of regulations.



# MONTGOMERY COUNTY BOARD OF EDUCATION

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- **Include clear transition provisions and implementation timelines that protect current employees and prevent service disruptions.** Unclear transition provisions for current employees may create staffing instability or service disruptions if not properly addressed.
- **Provide flexibility in qualification equivalencies aligned with school-based competencies.** Current interpreters, especially those who are nearing the end of their career, might be hesitant to devote the time and money needed to obtain licensure. Allowing qualification equivalencies may limit the risk of losing individuals who have demonstrated skills needed to be successful in their field, but who are not interested in, or able to complete, a traditional licensure pathway.
- **Allow sufficient implementation time and fiscal planning to mitigate recruitment and retention risks.** Additional professional learning, renewal, and compliance requirements may require resource planning and structured timelines to avoid workforce attrition. School systems need time to address these concerns before any new requirements go into effect.

Montgomery County Board of Education also supports and joins in the efforts of the Public Schools Superintendents' Association of Maryland and the Maryland Association of Boards of Education to amend this bill to better suit the needs to school systems.

Because the Montgomery County Board of Education supports the goal of the bill and acknowledges the importance of having qualified interpreters in our schools, it supports Senate Bill 645 and urges a **favorable** report with the amendments proposed herein.

**SB645 - King - Sponsor Testimony.pdf**

Uploaded by: Senator Nancy King

Position: FWA

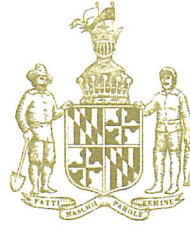
NANCY J. KING  
Legislative District 39  
Montgomery County

MAJORITY LEADER

Budget and Taxation Committee

*Chair*

Education, Business, and  
Administration Subcommittee



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THE SENATE OF MARYLAND  
ANNAPOLIS, MARYLAND 21401

**Senate Bill 645 – State Board of Sign Language Interpreters – Membership and Licensing**

February 26, 2026

Mister Chairman and Members of the Education, Energy and the Environment Committee:

During the 2023 legislative session, the legislature passed the Maryland Sign Language Interpreters Act. This Act, among other things, established licensing requirements for sign language interpreters, established a State Board of Sign Language Interpreters, and set dates for regulations and requirements.

In creating a new regulatory process there are often issues that arise that need further discussion and legislative input. Senate Bill 645 will do a few things:

1. It will realign dates that have already passed and have not been met.
2. It will add members to the State Board of Sign Language Interpreters to allow for broader input and bring the operations of the Board more in line with other similar occupational licensure boards.
3. It adds reporting requirements and stakeholder input as the Board develops regulations related to specialty licensing.
4. With the sponsor technical amendment, it will allow the Board flexibility in setting qualifications for licensing as was intended in the original legislation.

Senate Bill 645 with sponsor amendments will strengthen the commitment to the Deaf and Hard of Hearing community to ensure protections from unqualified or fraudulent interpreters, it will elevate the profession of sign language interpretation, and it will put the Office and the Board in the best position for successful implementation of this important licensing legislation.

I respectfully request a favorable report on Senate Bill 645.

**SB645 2nd Sponsor Amendment A63D205B-3C98-42B4-AEB**

Uploaded by: Senator Nancy King

Position: FWA



SB0645/293621/1

AMENDMENTS  
PREPARED  
BY THE  
DEPT. OF LEGISLATIVE  
SERVICES

24 FEB 26  
11:15:12

BY: Senator King  
(To be offered in the Education, Energy, and the Environment  
Committee)

AMENDMENTS TO SENATE BILL 645  
(First Reading File Bill)

AMENDMENT NO. 1

On page 1, after line 8, insert:

“BY repealing and reenacting, without amendments,  
Article - State Government  
Section 9-2401(a) and (o)  
Annotated Code of Maryland  
(2021 Replacement Volume and 2025 Supplement)”.

AMENDMENT NO. 2

On page 1, after line 22, insert:

“9-2401.

(a) In this subtitle the following words have the meanings indicated.

(o) “Office” means the Office of the Deaf and Hard of Hearing.”.

On page 2, in line 17, after “OFFICIO” insert “NONVOTING”; in line 19, after  
“OFFICIO” insert “NONVOTING”; and in line 28, after “OFFICIO” insert “NONVOTING”.

On page 5, after line 26, insert:

“(3) THE OFFICE SHALL PROVIDE STAFF TO ASSIST THE BOARD IN  
COMPLETION OF THE REPORT REQUIRED UNDER THIS SUBSECTION.”.

**SB645 Sponsor Amendment 41A596C3-7FA8-4C13-93EA-30**

Uploaded by: Senator Nancy King

Position: FWA



SB0645/123325/1

AMENDMENTS  
PREPARED  
BY THE  
DEPT. OF LEGISLATIVE  
SERVICES

17 FEB 26  
16:54:52

BY: Senator King  
(To be offered in the Education, Energy, and the Environment  
Committee)

AMENDMENTS TO SENATE BILL 645

(First Reading File Bill)

AMENDMENT NO. 1

On page 1, in line 7, after “requirements;” insert “altering the documents an applicant must submit to the Board;”; in line 11, strike “and”; and in the same line, after “9-2415” insert “, and 9-2419”.

AMENDMENT NO. 2

On page 6, after line 9, insert:

“9-2419.

An applicant shall submit to the Board:

- (1) a completed application on the form provided by the Board;
- (2) payment of a nonrefundable application fee set by the Board; AND
- (3) (I) proof of a valid nationally or regionally recognized certification or other certification approved by the Board; [and] OR
- [(4)] (II) documentation of satisfactory completion of any other qualifications established by the Board.”.

**SB645 GODHH Testimony.docx (2).pdf**

Uploaded by: Usherla DeBerry

Position: FWA

**Wes Moore**  
*Governor*

**Usherla DeBerry**  
*Director*

**Aruna Miller**  
*Lt. Governor*



TO: Chair Feldman, Vice Chair Kagan, and Members of the Education, Energy, and the Environment Committee

FROM: Governor's Office of the Deaf and Hard of Hearing

SUBJECT: Testimony on SB645/HB1192 (State Board of Sign Language Interpreters - Membership and Licensing)

Position: Favorable with Amendments

HEARING DATE: February 26, 2026

---

My name is Usherla DeBerry, and I serve as the Director of the Governor's Office of the Deaf and Hard of Hearing (ODHH). I respectfully submit this testimony in strong support of SB0645.

This bill strengthens the structure and functioning of the State Board of Sign Language Interpreters, ensuring that the licensing, oversight, and professional standards of interpreters meet best practices and reflect the needs of Deaf, DeafBlind, and Hard of Hearing Marylanders.

This expansion ensures decision-making reflects the lived experiences and needs of the communities served, particularly those with unique communication access requirements. Including DeafBlind representation recognizes the distinct needs of this community, which has historically been underrepresented in policy discussions.

The bill updates licensing timelines, requirements, and professional expectations for interpreters. This ensures interpreters meet current best practices, ethical standards, and are accountable to both the public and the communities they serve. High-quality, professional interpreting is critical in schools, hospitals, courts, workplaces, and government offices.

SB0645 also emphasizes informing the public about interpreter licensing and standards, helping individuals and organizations understand interpreter qualifications. This promotes safer and more equitable access to communication across all sectors.

ODHH is tasked with:

- Serving as an information clearinghouse on issues affecting Deaf, DeafBlind, and Hard of Hearing individuals
- Promoting access to services and culturally competent practices

Supporting SB0645 advances these statutory goals by enhancing access to professional interpreting, including community voices in policymaking, and improving coordination between government agencies, interpreters, and the communities served.

Passing SB0645 will:

- Build a stronger, accountable interpreter workforce
- Ensure inclusive governance reflecting community diversity
- Promote equity and accessibility in education, healthcare, legal, and public service settings
- Reduce barriers and improve outcomes for Deaf, DeafBlind, and Hard of Hearing Marylanders

For these reasons, the Governor's Office of the Deaf and Hard of Hearing strongly supports SB0645 and urges a favorable report.

Respectfully submitted,

Usherla DeBerry

Director

Governor's Office of the Deaf and Hard of Hearing

**SB 645 - FWA - UMMS.pdf**

Uploaded by: Will Tilburg

Position: FWA

## **Senate Bill 645 – State Board of Sign Language Interpreters – Membership and Licensing**

### **POSITION: Favorable with Amendments**

February 26, 2026

Education, Energy, and the Environment Committee

The University of Maryland Medical System (“UMMS”) supports Senate Bill 645 – State Board of Sign Language Interpreters – Membership and Licensing, with amendments. Senate Bill 645 (“SB 645”) would make alterations to the Maryland Sign Language Interpreters Act (2023), including expanding membership of the State Board of Sign Language Interpreters (“SBSLI”) to include several licensed interpreters for the deaf and hard of hearing and requiring the Board to draft and submit a report to the General Assembly before adopting regulations governing specialty areas such as legal, medical, and behavioral health settings.

UMMS greatly appreciates the bill sponsor introducing this legislation to strengthen the State Board of Sign Language Interpreters (the “Board”) and the Maryland Sign Language Interpreters Act (the “Act”), which was originally passed in 2023. The Act requires that sign language interpreters in Maryland meet national certification standards and that deaf and hard of hearing individuals in the State have access to competent and qualified sign language interpretation services. By expanding the number of licensed interpreters on the Board, and requiring that at least three Board members provide services with an interpreter agency or in educational, legal, and medical settings, SB 645 will add important viewpoints and expertise to the Board. These viewpoints will be particularly essential over the next year as the Board develops its initial license requirements and regulations governing the licensing process. UMMS strongly supports the initial licensing framework created by the General Assembly, and believes that SB 645 will provide important and targeted changes and clarifications to assist the Board with finalizing the licensing requirements.

UMMS is committed to improving the lives and wellbeing of the patients we serve, and this includes providing high-quality interpretation services to individuals who are deaf or hard of hearing. Our hospitals, emergency departments, freestanding medical facilities, urgent care centers, and other health care facilities contract with leading sign language interpretation service providers for in-person and video remote interpreting (“VRI”) services. And, at least two hospitals also employ a full-time medical interpreter in American Sign Language. All interpreters, whether in person or VRI, meet the National Association of the Deaf (“NAD”), Registry of Interpreters for the Deaf (“RID”), or Board of Evaluation for Interpreters (“BEI”) certification standards, which serve as the basis for sign language interpreter licensing

requirements in the Act. In FY25, UMMS acute care hospitals alone utilized the services of qualified ASL interpreters for more than 9,000 patient encounters (see Table 1 below).

**Table 1. FY2025 ASL Interpretation Services, by Hospital**

Member Organization	FY 2025 Total	
	VRI	In-person
UM Baltimore Washington Medical Center	558	
UM Charles Regional Medical Center	237	
University of Maryland Medical Center	5,806	430
UM Shore Regional Health	373	
UM Capital Region Health	538	10
UM Saint Joseph Medical Center	160	33
UM Upper Chesapeake Health	609	
UM Rehabilitation and Orthopaedic Institute	611	
<b>Total</b>	8,892	473

SB 645 proposes common sense alterations to the Act, which will assist the Board in developing and implementing a successful licensing scheme and promoting the growth of the sign language interpreter profession in Maryland. To further strengthen the bill, UMMS supports the amendments proposed by the Maryland Hospital Association. These amendments are based on discussions with certified sign language interpreters and agencies, stakeholders across the education, judicial, and health care sectors, and a comprehensive review of the Act and the draft regulations developed by the Board to license Sign Language Interpreters to implement the Act, which were published in the Maryland Register on May 16, 2025. UMMS supports all of the amendments proposed by MHA, but the focus of this letter is on three issues that are critical to a successful regulatory rollout of the licensing requirements for sign language interpreters:

- 1. Clarify whether State agencies, county and municipal governments, schools, courts, colleges and universities, hospitals, and other settings are required to provide in-person interpretation services – as opposed to video remote interpreting services – if requested by an individual who is deaf or hard of hearing.**

In the Act, the General Assembly directed the Board to adopt regulations to implement the legislation. In particular, in §9-2415(b)(3) of the State Government Article, the Board is directed to:

*Adopt regulations to...allow deaf and hard of hearing individuals to determine whether they **prefer** sign language interpretation services being provided in a video remote interpreting setting or through in-person interpreting.*

In the draft regulations published in May 2025, the Board proposed to implement this provision by requiring interpreters and agencies to provide sign language interpreting services via VRI or on-site,

in-person interpreting ***“according to the preference of the consumer.”*** Further, any interpreter or agency who cannot provide the type of interpretation requested is ***prohibited*** under regulation from providing the individual with interpreting services. While consumer choice may be an appropriate option in many settings, it is not practical in hospitals, emergency departments, or other healthcare facilities that provide emergency medical care. There are simply not enough certified interpreters in Maryland to meet the sizable demand for interpretive services in the healthcare sector. As of this writing, the State of Maryland has fewer than 500 certified ASL interpreters. In contrast, the University of Maryland Medical Center in Baltimore City – one of 11 UMMS hospitals – received more than 6,200 ASL requests in Fiscal Year 2025 (July 1, 2024– June 30, 2025). There are more than 60 hospitals and thousands of health care facilities in the State. Given the volume of demand for interpreting services and the scarcity of qualified interpreters in the State, it is impossible for these facilities to ensure in-person interpreting services. Yet, the only exception to the “consumer choice” provision in the draft regulations was “in the case of an emergency” – a term that was not defined in the regulatory proposal – interpreters and agencies could provide sign language interpreting services via VRI for *a maximum of 60 minutes*. UMMS hospitals have shared that when requesting in-person interpreting services it typically takes a minimum of 3 to 5 hours for an interpreter to arrive in urban and suburban areas, and up to 8 to 10 hours or longer in rural areas where there are few certified interpreters. Simply put, the regulatory proposal is unworkable.

The following is an excerpt of the draft regulations governing “consumer choice” proposed by the Board in May 2025:

**COMAR 14.41.01.08**

**.08 Consumer Choice.**

- A. Interpreters and agencies shall provide sign language interpreting services via VRI or on-site, in-person interpreting ***according to the preference of the consumer.***
- B. Prior to accepting a request for services, interpreters and agencies must ask the requester of the services whether the consumer prefers VRI or on-site, in-person interpreting.
- C. ***If the requester is requesting one type of service and the consumer prefers the other type, the interpreter or agency shall not provide sign language interpreting services.***
- D. In the case of an emergency, ***interpreters and agencies may provide sign language interpreting services via VRI for up to sixty (60) minutes.***

Establishing a requirement to provide in-person interpreting services is also inconsistent with the communication standards established by the federal Americans with Disabilities Act (the “ADA”). Department of Justice regulations implementing the ADA for State and local government services and public accommodations and commercial facilities give covered entities the choice of using VRI or on-site interpreters in situations where either would be effective. Importantly, if VRI is chosen, the covered entity must ensure that it includes real-time, full-motion video and audio, is large enough to display the interpreter’s face, arms, hands, and fingers, and a clear audible transmission of voices. All UMMS facilities must and do comply with this standard. The Board’s regulatory proposal is more stringent than the Americans with Disabilities Act, and given the shortage of

qualified interpreters in the State the proposed ban on interpreters providing interpreting services unless it is the type of service the consumer prefers (e.g., in-person) will result in fewer deaf and hard of hearing individuals receiving interpreting services.

Finally, in reviewing the testimony and hearings from 2023, the consumer choice provision is not discussed at any point. If it were widely understood that the Act would require covered entities, including state agencies and local governments, to provide on-site, in-person interpreting services on demand, the bill would have had a significant fiscal and operational impact. However, the fiscal and policy note only lists state expenditures related to hiring personnel in the Office of the Deaf and Hard of Hearing, and no reference to requirements for state agencies, local governments, and other covered entities hiring or contracting for in-person ASL interpreting services.

The Board's regulatory proposal to mandate consumer choice in all settings is not consistent with the statutory authorization granted to the Board in the Act, not aligned with federal law under the Americans with Disabilities Act, and impossible to comply with given the shortage of qualified interpreters in the State. Given these considerations, UMMS strongly encourages the Committee to clarify that §9-2415(b)(3) does not require state agencies, local governments, hospitals, courts, and other covered entities to provide on-site, in-person services based on consumer preference. (See Amendment #1 below)

## **2. Amend §9-2420 to Expressly Waive Licensing Requirements for Individuals Licensed to Provide Sign Language Interpretation Services in Another State.**

In the Act, the General Assembly authorized the Board to waive any part of the licensing requirements for an applicant who is licensed to provide sign language interpretation services in another state with qualifications that were substantially equivalent. This waiver would be contingent on the applicant paying to the board a non-refundable application fee and a license fee.

Despite this statutory grant of authority and clear direction from the General Assembly, the Board rejected establishing a waiver process for out-of-state applicants, stating

*Pursuant to the discretion granted to the Board in State Government Article, §9-2420, Annotated Code of Maryland, the Board elects not to waive any requirement of State Government Article, Title 9, for an applicant who is licensed to provide sign language interpretation services in another state.*

At least 20 states require licensure for ASL interpreters and most of these jurisdictions establish substantively equivalent qualifications, including certification by the Board for Evaluators of Interpreters, National Association of the Deaf, or Registry of the Interpreters for the Deaf. Currently, most interpreting services provided at health care facilities in the State use out-of-state interpreters who are licensed in other jurisdictions and/or hold NAD, RID, or BEI certification. These interpreters are critical to ensuring that hospitals and other health care facilities across the State can provide high-quality and time-sensitive care to critically ill and injured patients. Out-of-state interpreters are essential due in part to the ongoing sign language interpreter shortage. At

present, UMMS holds contracts with three entities that provide VRI services and each uses Maryland and out-of-state interpreters due to the extremely limited number of qualified interpreters in the State. Each of the out-of-state VRI interpreters is qualified to provide interpretive services, including certification by BEI, NAD, or RID. Given the high cost and administrative burden of applying for a license in another state, these agencies and interpreters may decide to no longer provide services in Maryland, rather than complete the licensing process, which would only exacerbate the current shortage. Therefore, UMMS urges the Committee to strike “may” and insert “shall” in §9-2420(a) to ensure the Board implements a commonsense waiver process for qualified applicants licensed in other jurisdictions. (See Amendment #2 below).

### **3. Revise the Dates for the Board to Publish Licensing Requirements and Sign Language Interpreters to Meet the Licensing Requirements.**

SB 645 proposes extending the statutory deadline for the Board to publish licensing requirements from July 1, 2024 (the date in the original Act) to December 31, 2026. UMMS appreciates the inclusion of an extension of this deadline and the accompanying recognition that the Board needs additional time to develop these requirements. However, UMMS does not believe December 31, 2026, will give the newly constituted Board adequate time to develop licensing requirements and recommends extending the deadline to July 1, 2027. SB 645 is scheduled to take effect on October 1, 2026, and establishes six new positions on the Board. Under law, the Office of Appointments may not appoint any of the new members until the legislation takes effect. Even if the new members were appointed on the same day the bill took effect, it would be difficult to develop licensing requirements in 90 days. Given the time it takes to solicit applications and interview and vet candidates, it is possible, if not likely, that all the new members may not even be appointed by December 31, 2026. Similarly, considering all the regulatory steps the Board must take to develop and implement the licensing requirements – develop licensing requirements, draft regulations, publish the draft regulations in the *Maryland Register* for a period of at least 30 days, solicit public comments on the draft regulations, respond to any substantive public comments, wait at least 15 days before issuing a notice of final action, develop and publish a license application, solicit license applications, and process license applications – it appears likely that more time will be needed. Therefore, UMMS recommends extending the date by which interpreters need to be licensed from July 1, 2027, to January 1, 2028. (See Amendment #3 below).

For these reasons, the University of Maryland Medical System supports SB 645, with amendments, and respectfully requests a *favorable* report on the bill.

For more information, please contact:

Will Tilburg  
Vice President, Government and Regulatory Affairs  
University of Maryland Medical System  
[William.Tilburg@umm.edu](mailto:William.Tilburg@umm.edu)

### **Amendment #1 – Consumer Choice**

UMMS supports the goal of consumer choice, and seeks to accommodate patients in-person, if requested. However, the inflexible requirement proposed by the Board in its May 2025 regulations will be impossible to implement. Given the limited number of interpreters in Maryland, in certain counties/jurisdictions, it would be virtually impossible for employers to consistently meet this requirement.

9-2415.

(b) The Board shall adopt regulations to:

(1) govern sign language interpretation services provided in a video remote interpreting setting;

(2) establish licensing and certification standards of interpreting agencies that do business in the State;

(3) allow deaf and hard of hearing individuals to ~~determine~~ **INDICATE** whether they prefer sign language interpretation services being provided in a video remote interpreting setting or through in-person interpreting **AND REQUIRE EMPLOYERS TO PROVIDE REASONABLE ACCOMMODATIONS TO SUPPORT THIS PREFERENCE TO THE EXTENT PRACTICABLE.**; and

(4) provide sign language interpretation services in a video remote interpreting setting.

### **Amendment #2**

In the Act (2023), the General Assembly gave clear direction to the Board to develop a waiver process for qualified interpreters licensed in other jurisdictions. Despite this direction, the Board has proposed regulations prohibiting waivers. UMMS recommends adopting this amendment to streamline the licensing process for individuals already certified and licensed in other jurisdictions. This will greatly assist with the implementation of the Act.

9-2420.

(a) Subject to the provisions of this section, the Board ~~may~~ **SHALL** waive any requirement of this part for an applicant who is licensed to provide sign language interpretation services in another state.

### **Amendment #3**

Given that the new members of the Board may not be appointed until October 2026, the deadlines for developing licensing requirements, promulgating regulations, and developing and implementing a licensing scheme are not reasonable. UMMS recommends granting the Board an additional 6 months for each statutory requirement.

§9-2414.

(a) The Board shall:

- (1) license qualified individuals to provide sign language interpretation services;
- (2) on or before [July 1, 2024] ~~December 31, 2026~~ JULY 1, 2027, establish and publish licensing requirements for sign language interpreting in all settings;
- (3) provide technical assistance to license applicants and other interested persons;
- (4) promote the profession of sign language interpreting, including providing workshops and trainings to raise public awareness and to facilitate professional development; and
- (5) perform any other duties assigned by the Director.

SECTION 4. AND BE IT FURTHER ENACTED, That:

(a) Beginning [January 1, 2025] ~~JULY 1, 2027~~ JANUARY 1, 2028, an individual who provides sign 30 language interpretation services in the State shall meet the requirements of Title 9, 31 Subtitle 24, Part III of the State Government Article, as enacted by Section 3 of this Act

**SB645BD.pdf**

Uploaded by: Blaise Delahoussaye

Position: UNF

Dear Education, Energy, and the Environment Committee:

I am writing regarding the proposed bill **SB0645 – State Board of Sign Language Interpreters: Membership and Licensing**. I strongly oppose this bill as currently written.

This legislation raises serious concerns for the Deaf, DeafBlind, and Hard of Hearing communities, who are directly impacted by the decisions of the State Board of Sign Language Interpreters.

Specifically:

- This bill dilutes Deaf, DeafBlind, and Hard of Hearing representation on the Licensure Board. The individuals most directly impacted by the Board's decisions must retain meaningful representation and authority in matters affecting our access, safety, and civil rights.
- The bill increases representation from groups that have historically caused significant harm to the Deaf, DeafBlind, and Hard of Hearing communities. This contradicts the original purpose of the Licensure Board, which was created to protect consumers and prevent further harm.
- Increased restrictions on the State Board of Sign Language Interpreters, particularly through expanded collaboration with stakeholders such as State Agencies, may weaken consumer protections and undermine the rights of Deaf, DeafBlind, and Hard of Hearing individuals, potentially leading to further harm.

The original licensure law and current regulations are the result of more than 15 years of collaboration among Deaf, DeafBlind, and Hard of Hearing community members and key stakeholders. These policies were carefully crafted to ensure consumer protection and uphold professional standards. Making sweeping changes at this stage undermines that work and continues a longstanding pattern of marginalization.

I respectfully urge you to oppose this bill.

Thank you for your time and careful consideration of this important matter.

Sincerely,

Blaise Delahoussaye

E-mail: [wolfrog65@yahoo.com](mailto:wolfrog65@yahoo.com)

**SB 645 – OPPOSE – S. Moore.pdf**

Uploaded by: Emily Dittmer

Position: UNF

February 23, 2026

**Education, Energy, and the Environment Committee**  
Maryland Senate  
Maryland General Assembly  
Annapolis, Maryland 21401

**RE: SB 645 – OPPOSE**

Dear Chair Feldman and Members of the Committee:

My name is Savannah Moore, and I am an ASL Sign Language Interpreter. I write to respectfully request an unfavorable report on SB 645.

The 2023 Maryland Sign Language Interpreters Act was passed after years of advocacy by Deaf, DeafBlind, DeafDisabled, and Hard-of-Hearing Marylanders who shared their lived experiences and documented harms before this body. The General Assembly responded by establishing a statewide licensure system designed to:

- Protect consumers
- Establish minimum competency standards
- Create a formal complaint and enforcement pathway
- Ensure accountability in medical, legal, educational, and behavioral health settings

SB 645 makes substantial structural changes before that system has been fully implemented. Specifically, the bill:

- Expands the Board to 11 members
- Reserves 4 voting seats for ex officio and government-agency affiliated members •
- Reduces independent licensed interpreter and consumer representation
- Allows Board action to occur without a practitioner or consumer majority present

Professional licensing boards are structured to exercise independent regulatory judgment in the public interest. Expanding institutional representation departs from Maryland's established licensing model and risks weakening the independent oversight framework enacted in 2023.

SB 645 also delays full licensure implementation until July 1, 2027, extending the period during which consumers lack a fully enforceable statewide standard and an operational complaint pathway. In addition, the bill inserts non-standard procedural barriers before specialty standards in high-risk settings may even be drafted. This further delays protections where competency safeguards are most critical.

In 2023, the General Assembly enacted this framework to protect consumers and ensure accountability. SB 645 alters that framework before it has had the opportunity to function as designed and risks weakening the very protections the Act was intended to provide.

**For these reasons, I respectfully urge you to oppose SB 645.**

Thank you for your time and consideration,

Savannah Moore

ASL Interpreter  
savannah.moore22@yahoo.com  
Edgewood, Maryland 21040

**SB 645 - OPPOSE - K. Bennett.pdf**

Uploaded by: Emily Dittmer

Position: UNF

**Education, Energy, and the Environment Committee**

Maryland Senate  
Maryland General Assembly  
Annapolis, Maryland 21401

**RE: SB 645 – OPPOSE**

Dear Chair Feldman and Members of the Committee:

My name is Dr. Kiva Bennett and I am an ASL-English interpreter. I write to respectfully request an unfavorable report on SB 645.

The 2023 Maryland Sign Language Interpreters Act was passed after years of advocacy by Deaf, DeafBlind, DeafDisabled, and Hard-of-Hearing Marylanders who shared their lived experiences and documented harms before this body. The General Assembly responded by establishing a statewide licensure system designed to:

- Protect consumers
- Establish minimum competency standards
- Create a formal complaint and enforcement pathway
- Ensure accountability in medical, legal, educational, and behavioral health settings

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- Reserves 4 voting seats for ex officio and government-agency affiliated members
- Reduces independent licensed interpreter and consumer representation
- Allows Board action to occur without a practitioner or consumer majority present

Professional licensing boards are structured to exercise independent regulatory judgment in the public interest. Expanding institutional representation departs from Maryland's established licensing model and risks weakening the independent oversight framework enacted in 2023.

SB 645 also delays full licensure implementation until July 1, 2027, extending the period during which consumers lack a fully enforceable statewide standard and an operational complaint pathway.

In addition, the bill inserts non-standard procedural barriers before specialty standards in high-risk settings may even be drafted. This further delays protections where competency safeguards are most critical.

In 2023, the General Assembly enacted this framework to protect consumers and ensure accountability. SB 645 alters that framework before it has had the opportunity to function as designed and risks weakening the very protections the Act was intended to provide.

For these reasons, I respectfully urge you to oppose SB 645.

Thank you for your time and consideration.

Respectfully,

Kiva Bennett, PhD  
ASL-English Interpreter  
kiva.m.bennett@gmail.com

**SB 645 - OPPOSE - M. DeSomma.pdf**

Uploaded by: Emily Dittmer

Position: UNF

February 22nd, 2026

**Education, Energy, and the Environment Committee**

Maryland Senate  
Maryland General Assembly  
Annapolis, Maryland 21401

**RE: SB 645 – OPPOSE**

Dear Education, Energy, and the Environment Committee:

My name is Meredith DeSomma, and I am a Deaf community member and interpreter practitioner. I am writing regarding the proposed bill **SB0645 – State Board of Sign Language Interpreters: Membership and Licensing**. I strongly oppose this bill as currently written.

This legislation raises serious concerns for the Deaf, DeafBlind, and Hard of Hearing communities, who are directly impacted by the decisions of the State Board of Sign Language Interpreters.

Specifically:

- This bill dilutes Deaf, DeafBlind, and Hard of Hearing representation on the Licensure Board. The individuals most directly impacted by the Board's decisions must retain meaningful representation and authority in matters affecting our access, safety, and civil rights.
- The bill increases representation from groups that have historically caused significant harm to the Deaf, DeafBlind, and Hard of Hearing communities. This contradicts the original purpose of the Licensure Board, which was created to protect consumers and prevent further harm.
- Increased restrictions on the State Board of Sign Language Interpreters, particularly through expanded collaboration with stakeholders such as State Agencies, may weaken consumer protections and undermine the rights of Deaf, DeafBlind, and Hard of Hearing individuals, potentially leading to further harm.

The original licensure law and current regulations are the result of more than 15 years of collaboration among Deaf, DeafBlind, and Hard of Hearing community members and key stakeholders. These policies were carefully crafted to ensure consumer protection and uphold professional standards. Making sweeping changes at this stage undermines that work and continues a longstanding pattern of marginalization.

I respectfully urge you to oppose this bill.

Thank you for your time and careful consideration of this important matter.

Sincerely,

Meredith DeSomma

Deaf Community Member & Interpreter Practitioner  
mdutchy81@gmail.com

**SB 645 - OPPOSE- E. Lemley.pdf**

Uploaded by: Emily Dittmer

Position: UNF

February 20, 2026

**Education, Energy, and the Environment Committee**

Maryland Senate  
Maryland General Assembly  
Annapolis, Maryland 21401

**RE: SB 645 – OPPOSE**

Dear Chair Feldman and Members of the Committee:

My name is Esther Lemley, and I am an interpreter who works often in the state of Maryland. I write to respectfully request an unfavorable report on SB 645.

The 2023 Maryland Sign Language Interpreters Act was passed after years of advocacy by Deaf, DeafBlind, DeafDisabled, and Hard-of-Hearing Marylanders who shared their lived experiences and documented harms before this body. The General Assembly responded by establishing a statewide licensure system designed to:

- Protect consumers
- Establish minimum competency standards
- Create a formal complaint and enforcement pathway
- Ensure accountability in medical, legal, educational, and behavioral health settings

SB 645 makes substantial structural changes before that system has been fully implemented.

Specifically, the bill:

- Expands the Board to 11 members
- Reserves 4 voting seats for ex officio and government-agency affiliated members
- Reduces independent licensed interpreter and consumer representation
- Allows Board action to occur without a practitioner or consumer majority present

Professional licensing boards are structured to exercise independent regulatory judgment in the public interest. Expanding institutional representation departs from Maryland's established licensing model and risks weakening the independent oversight framework enacted in 2023.

SB 645 also delays full licensure implementation until July 1, 2027, extending the period during which consumers lack a fully enforceable statewide standard and an operational complaint pathway.

In addition, the bill inserts non-standard procedural barriers before specialty standards in high-risk settings may even be drafted. This further delays protections where competency safeguards are most critical.

In 2023, the General Assembly enacted this framework to protect consumers and ensure accountability. SB 645 alters that framework before it has had the opportunity to function as designed and risks weakening the very protections the Act was intended to provide.

For these reasons, I respectfully urge you to oppose SB 645. Thank you for your time and consideration.

Respectfully,

Esther Lemley, MPA, QMHI, NIC  
estherlemley@gmail.com

**SB 645 - OPPOSE- J. Thomas.pdf**

Uploaded by: Emily Dittmer

Position: UNF

**Education, Energy, and the Environment Committee**

Maryland Senate  
Maryland General Assembly  
Annapolis, Maryland 21401

**RE: SB 645 – OPPOSE**

Dear Chair Feldman and Members of the Committee:

My name is Jake Thomas and I hold five national certifications as an American Sign Language (and court certified) interpreter. As National Testing Systems Coordinator for the Registry of Interpreters for the Deaf for nearly six years, I have led in the development and recertification of several knowledge and skills assessments for certifying professional sign language interpreters. I write to respectfully encourage opposition to SB 645.

The 2023 Maryland Sign Language Interpreters Act was passed after years of advocacy by Deaf, DeafBlind, DeafDisabled, and Hard-of-Hearing Marylanders who shared their lived experiences and documented harms before this body. The General Assembly responded by establishing a statewide licensure system designed to:

- Protect consumers
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In 2023, the General Assembly enacted this framework to protect consumers and ensure accountability. SB 645 alters that framework before it has had the opportunity to function as designed and risks weakening the very protections the Act was intended to provide.

**For these reasons, I respectfully urge you to oppose SB 645.**

Thank you for your time and consideration.

Respectfully,  
Jake Thomas, CI, CT, OTC, NIC, SC:L

Hughesville, MD 20637  
jakethomasASL@gmail.com

**SB645 - OPPOSE - D. Ballmer .pdf**

Uploaded by: Emily Dittmer

Position: UNF

February 23rd, 2026

**Energy, Education, and the Environment Committee**

Maryland Senate

Maryland General Assembly

Annapolis, Maryland 21401

**RE: SB 645 – OPPOSE**

Dear Education, Energy, and the Environment Committee:

My name is Donna Ballmer, and I am a member of the Deaf community. I am writing regarding the proposed bill **SB0645 – State Board of Sign Language Interpreters: Membership and Licensing**. I strongly oppose this bill as currently written.

This legislation raises serious concerns for the Deaf, DeafBlind, and Hard of Hearing communities, who are directly impacted by the decisions of the State Board of Sign Language Interpreters.

Specifically:

- This bill dilutes Deaf, DeafBlind, and Hard of Hearing representation on the Licensure Board. The individuals most directly impacted by the Board's decisions must retain meaningful representation and authority in matters affecting our access, safety, and civil rights.
- The bill increases representation from groups that have historically caused significant harm to the Deaf, DeafBlind, and Hard of Hearing communities. This contradicts the original purpose of the Licensure Board, which was created to protect consumers and prevent further harm.
- Increased restrictions on the State Board of Sign Language Interpreters, particularly through expanded collaboration with stakeholders such as State Agencies, may weaken consumer protections and undermine the rights of Deaf, DeafBlind, and Hard of Hearing individuals, potentially leading to further harm.

The original licensure law and current regulations are the result of more than 15 years of collaboration among Deaf, DeafBlind, and Hard of Hearing community members and key stakeholders. These policies were carefully crafted to ensure consumer protection and uphold professional standards. Making sweeping changes at this stage undermines that work and continues a longstanding pattern of marginalization.

I respectfully urge you to oppose this bill.

Thank you for your time and careful consideration of this important matter.

Donna Ballmer

Deaf Community Member

dlballmer@gmail.com

**SB645 - OPPOSE - D. Tilden.pdf**

Uploaded by: Emily Dittmer

Position: UNF

February 22nd, 2026

**Education, Energy, and the Environment Committee**

Maryland Senate  
Maryland General Assembly  
Annapolis, Maryland 21401

**RE: SB 645 – OPPOSE**

Dear Education, Energy, and the Environment Committee:

My name is Deanna Tilden, and I am a member of the Deaf community. I am writing regarding the proposed bill **SB0645 – State Board of Sign Language Interpreters: Membership and Licensing**. I strongly oppose this bill as currently written.

This legislation raises serious concerns for the Deaf, DeafBlind, and Hard of Hearing communities, who are directly impacted by the decisions of the State Board of Sign Language Interpreters.

Specifically:

- This bill dilutes Deaf, DeafBlind, and Hard of Hearing representation on the Licensure Board. The individuals most directly impacted by the Board's decisions must retain meaningful representation and authority in matters affecting our access, safety, and civil rights.
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I respectfully urge you to oppose this bill.

Thank you for your time and careful consideration of this important matter.

Deanna Tilden  
Deaf Community Member  
dtilden86@gmail.com

**SB645 - OPPOSE - E. Dittmer.pdf**

Uploaded by: Emily Dittmer

Position: UNF

February 24th, 2026

**Education, Energy, and the Environment Committee**

Maryland Senate

Maryland General Assembly

Annapolis, Maryland 21401

**RE: SB 645 – OPPOSE**

Dear Chair Feldman and Members of the Committee:

My name is Emily Dittmer, and I am a certified ASL interpreter working in Maryland writing to respectfully request an unfavorable report on SB 645.

The 2023 Maryland Sign Language Interpreters Act was passed after years of advocacy by Deaf, DeafBlind, DeafDisabled, and Hard-of-Hearing Marylanders who shared their lived experiences and documented harms before this body. The General Assembly responded by establishing a statewide licensure system designed to:

- Protect consumers
- Establish minimum competency standards
- Create a formal complaint and enforcement pathway
- Ensure accountability in medical, legal, educational, and behavioral health settings

SB 645 makes substantial structural changes before that system has been fully implemented. Specifically, the bill:

- Expands the Board to 11 members
- Reserves 4 voting seats for ex officio and government-agency affiliated members
- Reduces independent licensed interpreter and consumer representation
- Allows Board action to occur without a practitioner or consumer majority present

Professional licensing boards are structured to exercise independent regulatory judgment in the public interest. Expanding institutional representation departs from Maryland's established licensing model and risks weakening the independent oversight framework enacted in 2023.

SB 645 also delays full licensure implementation until July 1, 2027, extending the period during which consumers lack a fully enforceable statewide standard and an operational complaint pathway.

In addition, the bill inserts non-standard procedural barriers before specialty standards in high-risk settings may even be drafted. This further delays protections where competency safeguards are most critical.

In 2023, the General Assembly enacted this framework to protect consumers and ensure accountability. SB 645 alters that framework before it has had the opportunity to function as designed and risks weakening the very protections the Act was intended to provide. For these reasons, I respectfully urge you to oppose SB 645.

Thank you for your time and consideration.

Respectfully,

Emily Dittmer, NIC  
Certified ASL Interpreter  
dittmerinterpreting@gmail.com

**SB645 - OPPOSE - G. Davis.pdf**

Uploaded by: Emily Dittmer

Position: UNF

February 22, 2026

**Education, Energy, and the Environment Committee**

Maryland Senate  
Maryland General Assembly  
Annapolis, Maryland 21401

**RE: SB 645 – OPPOSE**

Dear Education, Energy, and the Environment Committee:

My name is Gabrielle Davis, and I am a Deaf community member. I am writing regarding the proposed bill **SB0645 – State Board of Sign Language Interpreters: Membership and Licensing**. I strongly oppose this bill as currently written.

This legislation raises serious concerns for the Deaf, DeafBlind, and Hard of Hearing communities, who are directly impacted by the decisions of the State Board of Sign Language Interpreters.

Specifically:

- This bill dilutes Deaf, DeafBlind, and Hard of Hearing representation on the Licensure Board. The individuals most directly impacted by the Board's decisions must retain meaningful representation and authority in matters affecting our access, safety, and civil rights.
- The bill increases representation from groups that have historically caused significant harm to the Deaf, DeafBlind, and Hard of Hearing communities. This contradicts the original purpose of the Licensure Board, which was created to protect consumers and prevent further harm.
- Increased restrictions on the State Board of Sign Language Interpreters, particularly through expanded collaboration with stakeholders such as State Agencies, may weaken consumer protections and undermine the rights of Deaf, DeafBlind, and Hard of Hearing individuals, potentially leading to further harm.

The original licensure law and current regulations are the result of more than 15 years of collaboration among Deaf, DeafBlind, and Hard of Hearing community members and key stakeholders. These policies were carefully crafted to ensure consumer protection and uphold professional standards. Making sweeping changes at this stage undermines that work and continues a longstanding pattern of marginalization.

I respectfully urge you to oppose this bill.

Thank you for your time and careful consideration of this important matter.

Gabrielle Davis  
President  
Prince George's County Association of the Deaf (PGCAD)  
PGCAD2020@gmail.com

**SB645 - OPPOSE - H. Avner.pdf**

Uploaded by: Emily Dittmer

Position: UNF

February 23rd, 2026

**Education, Energy, and the Environment Committee**

Maryland Senate  
Maryland General Assembly  
Annapolis, Maryland 21401

**RE: SB 645 – OPPOSE**

Dear Chair Feldman and Members of the Committee:

My name is Helen Avner, and I am an ASL interpreter living and working in Maryland. I write to respectfully request an unfavorable report on SB 645.

The 2023 Maryland Sign Language Interpreters Act was passed after years of advocacy by Deaf, DeafBlind, DeafDisabled, and Hard-of-Hearing Marylanders who shared their lived experiences and documented harms before this body. The General Assembly responded by establishing a statewide licensure system designed to:

- Protect consumers
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SB 645 also delays full licensure implementation until July 1, 2027, extending the period during which consumers lack a fully enforceable statewide standard and an operational complaint pathway.

In addition, the bill inserts non-standard procedural barriers before specialty standards in high-risk settings may even be drafted. This further delays protections where competency safeguards are most critical.

In 2023, the General Assembly enacted this framework to protect consumers and ensure accountability. SB 645 alters that framework before it has had the opportunity to function as designed and risks weakening the very protections the Act was intended to provide.

For these reasons, I respectfully urge you to oppose SB 645.

Thank you for your time and consideration.

Respectfully,

Helen Avner, ASL Interpreter

helenavnerASL@gmail.com

**SB645 - OPPOSE - J. Elliott.pdf**

Uploaded by: Emily Dittmer

Position: UNF

February 23rd, 2026

**Education, Energy, and the Environment Committee**

Maryland Senate  
Maryland General Assembly  
Annapolis, Maryland 21401

**RE: SB 645 – OPPOSE**

Dear Education, Energy, and the Environment Committee:

My name is JoAnn Elliott, and I am a member of the Deaf community. I am writing regarding the proposed bill **SB0645 – State Board of Sign Language Interpreters: Membership and Licensing**. I strongly oppose this bill as currently written.

This legislation raises serious concerns for the Deaf, DeafBlind, and Hard of Hearing communities, who are directly impacted by the decisions of the State Board of Sign Language Interpreters.

Specifically:

- This bill dilutes Deaf, DeafBlind, and Hard of Hearing representation on the Licensure Board. The individuals most directly impacted by the Board's decisions must retain meaningful representation and authority in matters affecting our access, safety, and civil rights.
- The bill increases representation from groups that have historically caused significant harm to the Deaf, DeafBlind, and Hard of Hearing communities. This contradicts the original purpose of the Licensure Board, which was created to protect consumers and prevent further harm.
- Increased restrictions on the State Board of Sign Language Interpreters, particularly through expanded collaboration with stakeholders such as State Agencies, may weaken consumer protections and undermine the rights of Deaf, DeafBlind, and Hard of Hearing individuals, potentially leading to further harm.

The original licensure law and current regulations are the result of more than 15 years of collaboration among Deaf, DeafBlind, and Hard of Hearing community members and key stakeholders. These policies were carefully crafted to ensure consumer protection and uphold professional standards. Making sweeping changes at this stage undermines that work and continues a longstanding pattern of marginalization.

I respectfully urge you to oppose this bill.

Thank you for your time and careful consideration of this important matter.

JoAnn Elliott  
Deaf Community Member  
elliott.tilden@gmail.com

**SB645 - OPPOSE - J. Orr.pdf**

Uploaded by: Emily Dittmer

Position: UNF

February 20th, 2026

**Education, Energy, and the Environment Committee**

Maryland Senate  
Maryland General Assembly  
Annapolis, Maryland 21401

**RE: SB 645 – OPPOSE**

Dear Chair Feldman and Members of the Committee:

My name is Jadalynn Orr, and I am a Nationally Certified Interpreter in Southern Maryland, and I respectfully request an unfavorable report on SB 645.

The 2023 Maryland Sign Language Interpreters Act was passed after years of advocacy by Deaf, DeafBlind, DeafDisabled, and Hard-of-Hearing Marylanders who shared their lived experiences and documented harms before this body. The General Assembly responded by establishing a statewide licensure system designed to:

- Protect consumers
- Establish minimum competency standards
- Create a formal complaint and enforcement pathway
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In addition, the bill inserts non-standard procedural barriers before specialty standards in high-risk settings may even be drafted. This further delays protections where competency safeguards are most critical.

In 2023, the General Assembly enacted this framework to protect consumers and ensure accountability. SB 645 alters that framework before it has had the opportunity to function as designed and risks weakening the very protections the Act was intended to provide.

For these reasons, I respectfully urge you to oppose SB 645.

Thank you for your time and consideration.

Respectfully,

Jadalynn Orr

February 20th, 2026

Proudly serving Southern Maryland since 2013  
Jadarorr@gmail.com

**SB645 - OPPOSE - J.Ballmer .pdf**

Uploaded by: Emily Dittmer

Position: UNF

February 23rd, 2026

**Energy, Education, and the Environment Committee**

Maryland Senate

Maryland General Assembly

Annapolis, Maryland 21401

**RE: SB 645 – OPPOSE**

Dear Education, Energy, and the Environment Committee:

My name is James Ballmer and I am a Deaf community member. I am writing regarding the proposed bill **SB0645 – State Board of Sign Language Interpreters: Membership and Licensing**. I strongly oppose this bill as currently written.

This legislation raises serious concerns for the Deaf, DeafBlind, and Hard of Hearing communities, who are directly impacted by the decisions of the State Board of Sign Language Interpreters.

Specifically:

- This bill dilutes Deaf, DeafBlind, and Hard of Hearing representation on the Licensure Board. The individuals most directly impacted by the Board's decisions must retain meaningful representation and authority in matters affecting our access, safety, and civil rights.
- The bill increases representation from groups that have historically caused significant harm to the Deaf, DeafBlind, and Hard of Hearing communities. This contradicts the original purpose of the Licensure Board, which was created to protect consumers and prevent further harm.
- Increased restrictions on the State Board of Sign Language Interpreters, particularly through expanded collaboration with stakeholders such as State Agencies, may weaken consumer protections and undermine the rights of Deaf, DeafBlind, and Hard of Hearing individuals, potentially leading to further harm.

The original licensure law and current regulations are the result of more than 15 years of collaboration among Deaf, DeafBlind, and Hard of Hearing community members and key stakeholders. These policies were carefully crafted to ensure consumer protection and uphold professional standards. Making sweeping changes at this stage undermines that work and continues a longstanding pattern of marginalization.

I respectfully urge you to oppose this bill.

Thank you for your time and careful consideration of this important matter.

James Ballmer

Deaf Community Member

[jkbllmer@gmail.com](mailto:jkbllmer@gmail.com)

**SB645 - OPPOSE - J.Mounty.pdf**

Uploaded by: Emily Dittmer

Position: UNF

February 20th, 2026

**Education, Energy, and the Environment Committee**

Maryland Senate

Maryland General Assembly

Annapolis, Maryland 21401

**RE: SB 645 – OPPOSE**

Dear Education, Energy, and the Environment Committee:

My name is Judith L. Mouny, and I am a Deaf licensed behavioral health provider in Maryland writing regarding the proposed bill **SB0645 – State Board of Sign Language Interpreters: Membership and Licensing**. I strongly oppose this bill as currently written.

This legislation raises serious concerns for the Deaf, DeafBlind, and Hard of Hearing communities, who are directly impacted by the decisions of the State Board of Sign Language Interpreters.

Specifically:

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I respectfully urge you to oppose this bill.

Thank you for your time and careful consideration of this important matter.

Judith L. Mouny, Ed.D., MSW, LCSW-C

Takoma Park, Maryland

[jmouny@gmail.com](mailto:jmouny@gmail.com)

**SB645 - OPPOSE - M. Doremus .pdf**

Uploaded by: Emily Dittmer

Position: UNF

February 23rd, 2026

**Education, Energy, and the Environment Committee**

Maryland Senate  
Maryland General Assembly  
Annapolis, Maryland 21401

**RE: SB 645 – OPPOSE**

Dear Chair Feldman and Members of the Committee:

My name is Marianne Doremus, and I am an ASL interpreter. I write to respectfully request an unfavorable report on SB 645.

The 2023 Maryland Sign Language Interpreters Act was passed after years of advocacy by Deaf, DeafBlind, DeafDisabled, and Hard-of-Hearing Marylanders who shared their lived experiences and documented harms before this body. The General Assembly responded by establishing a statewide licensure system designed to:

- Protect consumers
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In addition, the bill inserts non-standard procedural barriers before specialty standards in high-risk settings may even be drafted. This further delays protections where competency safeguards are most critical.

In 2023, the General Assembly enacted this framework to protect consumers and ensure accountability. SB 645 alters that framework before it has had the opportunity to function as designed and risks weakening the very protections the Act was intended to provide.

For these reasons, I respectfully urge you to oppose SB 645.

Thank you for your time and consideration.

Respectfully,

Marianne Doremus, BAI, NIC, CSC  
Certified Sign Language Interpreter  
marianne@doremus4.com

**SB645 - OPPOSE - R. Gordon.pdf**

Uploaded by: Emily Dittmer

Position: UNF

February 23rd, 2026

**Education, Energy, and the Environment Committee**

Maryland Senate  
Maryland General Assembly  
Annapolis, Maryland 21401

**RE: SB 645 – OPPOSE**

Dear Chair Feldman and Members of the Committee:

My name is Renee Baylor Gordon and I am an ASL Interpreter. I write to respectfully request an unfavorable report on SB 645.

The 2023 Maryland Sign Language Interpreters Act was passed after years of advocacy by Deaf, DeafBlind, DeafDisabled, and Hard-of-Hearing Marylanders who shared their lived experiences and documented harms before this body. The General Assembly responded by establishing a statewide licensure system designed to:

- Protect consumers
- Establish minimum competency standards
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In 2023, the General Assembly enacted this framework to protect consumers and ensure accountability. SB 645 alters that framework before it has had the opportunity to function as designed and risks weakening the very protections the Act was intended to provide.

For these reasons, I respectfully urge you to oppose SB 645.

Thank you for your time and consideration.

Respectfully,

Renee L. Baylor Gordon  
ASL Interpreter and PCRID Liaison-Eastern Shore  
renee.lbgordon@gmail.com

**SB645 - OPPOSE - T. Bera.pdf**

Uploaded by: Emily Dittmer

Position: UNF

February 23rd, 2026

**Energy, Education, and the Environment Committee**

Maryland Senate

Maryland General Assembly

Annapolis, Maryland 21401

**RE: SB 645 – OPPOSE**

Dear Education, Energy, and the Environment Committee:

My name is Tiasha Bera, and I am a member of the Deaf community. I am writing regarding the proposed bill **SB0645 – State Board of Sign Language Interpreters: Membership and Licensing**. I strongly oppose this bill as currently written.

This legislation raises serious concerns for the Deaf, DeafBlind, and Hard of Hearing communities, who are directly impacted by the decisions of the State Board of Sign Language Interpreters.

Specifically:

- This bill dilutes Deaf, DeafBlind, and Hard of Hearing representation on the Licensure Board. The individuals most directly impacted by the Board's decisions must retain meaningful representation and authority in matters affecting our access, safety, and civil rights.
- The bill increases representation from groups that have historically caused significant harm to the Deaf, DeafBlind, and Hard of Hearing communities. This contradicts the original purpose of the Licensure Board, which was created to protect consumers and prevent further harm.
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The original licensure law and current regulations are the result of more than 15 years of collaboration among Deaf, DeafBlind, and Hard of Hearing community members and key stakeholders. These policies were carefully crafted to ensure consumer protection and uphold professional standards. Making sweeping changes at this stage undermines that work and continues a longstanding pattern of marginalization.

I respectfully urge you to oppose this bill.

Thank you for your time and careful consideration of this important matter.

Sincerely,

TIASHA BERA

Deaf Community Member

tiasha.bera@gmail.com

# **SB645 - OPPOSE - V. Schroeder.pdf**

Uploaded by: Emily Dittmer

Position: UNF

February 23rd, 2026

**Education, Energy, and the Environment Committee**

Maryland Senate  
Maryland General Assembly  
Annapolis, Maryland 21401

**RE: SB 645 – OPPOSE**

Dear Chair Feldman and Members of the Committee:

My name is Vivienne Schroeder, and I am a Deaf consumer of interpreting services and a lifelong Maryland resident. I am writing to respectfully request an unfavorable report on SB 645.

The 2023 Maryland Sign Language Interpreters Act was passed after years of advocacy by Deaf, DeafBlind, DeafDisabled, and Hard-of-Hearing Marylanders who shared their lived experiences and documented harms before this body. The General Assembly responded by establishing a statewide licensure system designed to:

- Protect consumers
- Establish minimum competency standards
- Create a formal complaint and enforcement pathway
- Ensure accountability in medical, legal, educational, and behavioral health settings SB 645

makes substantial structural changes before that system has been fully implemented. Specifically, the bill:

- Expands the Board to 11 members
- Reserves 4 voting seats for ex officio and government-agency affiliated members
- Reduces independent licensed interpreter and consumer representation
- Allows Board action to occur without a practitioner or consumer majority present

Professional licensing boards are structured to exercise independent regulatory judgment in the public interest. Expanding institutional representation departs from Maryland's established licensing model and risks weakening the independent oversight framework enacted in 2023.

SB 645 also delays full licensure implementation until July 1, 2027, extending the period during which consumers lack a fully enforceable statewide standard and an operational complaint pathway.

In addition, the bill inserts non-standard procedural barriers before specialty standards in high-risk settings may even be drafted. This further delays protections where competency safeguards are most critical.

In 2023, the General Assembly enacted this framework to protect consumers and ensure accountability. SB 645 alters that framework before it has had the opportunity to function as designed and risks weakening the very protections the Act was intended to provide.

For these reasons, I respectfully urge you to oppose SB 645.

Thank you for your time and consideration.

Respectfully,  
Vivienne Schroeder  
PG County Resident  
viviwrites22@gmail.com

# **SB645UH.pdf**

Uploaded by: Karl Ulf Hedberg

Position: UNF

Dear Education, Energy, and the Environment Committee:

I am writing regarding the proposed bill **SB0645 – State Board of Sign Language Interpreters: Membership and Licensing**. I strongly oppose this bill as currently written.

This legislation raises serious concerns for the Deaf, DeafBlind, and Hard of Hearing communities, who are directly impacted by the decisions of the State Board of Sign Language Interpreters.

Specifically:

- This bill dilutes Deaf, DeafBlind, and Hard of Hearing representation on the Licensure Board. The individuals most directly impacted by the Board's decisions must retain meaningful representation and authority in matters affecting our access, safety, and civil rights.
- The bill increases representation from groups that have historically caused significant harm to the Deaf, DeafBlind, and Hard of Hearing communities. This contradicts the original purpose of the Licensure Board, which was created to protect consumers and prevent further harm.
- Increased restrictions on the State Board of Sign Language Interpreters, particularly through expanded collaboration with stakeholders such as State Agencies, may weaken consumer protections and undermine the rights of Deaf, DeafBlind, and Hard of Hearing individuals, potentially leading to further harm.

The original licensure law and current regulations are the result of more than 15 years of collaboration among Deaf, DeafBlind, and Hard of Hearing community members and key stakeholders. These policies were carefully crafted to ensure consumer protection and uphold professional standards. Making sweeping changes at this stage undermines that work and continues a longstanding pattern of marginalization.

I respectfully urge you to oppose this bill.

Thank you for your time and careful consideration of this important matter.

Sincerely,

Ulf Hedberg

E-mail: [sweducks@yahoo.com](mailto:sweducks@yahoo.com)

**SB645, UNFAV, Energy, Ed, Enviro.pdf**

Uploaded by: Lore Rosenthal

Position: UNF

## **Senate Energy, Education, and Environment**

Maryland Senate  
Maryland General Assembly  
Annapolis, Maryland 21401

### **RE: SB 645- State Board of Sign Language Interpreters - Membership and Licensing – OPPOSE**

Dear Chair Feldman and Members of the Committee:

My name is Lore Rosenthal, and I am a Sign Language Interpreter with over 45 years experience. I write to respectfully request an unfavorable report on SB 645.

The 2023 Maryland Sign Language Interpreters Act was passed after years of advocacy by Deaf, DeafBlind, DeafDisabled, and Hard-of-Hearing Marylanders who shared their lived experiences and documented harms before this body. The General Assembly responded by establishing a statewide licensure system designed to:

- Protect consumers
- Establish minimum competency standards
- Create a formal complaint and enforcement pathway
- Ensure accountability in medical, legal, educational, and behavioral health settings

#### **SB 645 makes substantial structural changes before that system has been fully implemented.**

Specifically, the bill:

- Expands the Board to 11 members
- Reserves 4 voting seats for ex officio and government-agency affiliated members who do not necessarily know about the profession.
- Reduces independent licensed interpreter and consumer representation
- Allows Board action to occur without a practitioner or consumer majority present

Professional licensing boards are structured to exercise independent regulatory judgment in the public interest. Expanding institutional representation departs from Maryland's established licensing model and risks weakening the independent oversight framework enacted in 2023.

SB 645 also delays full licensure implementation until July 1, 2027, extending the period during which consumers lack a fully enforceable statewide standard and an operational complaint pathway.

In addition, the bill inserts non-standard procedural barriers before specialty standards in high-risk settings may even be drafted. This further delays protections where competency safeguards are most critical.

In 2023, the General Assembly enacted this framework to protect consumers and ensure accountability. SB 645 alters that framework before it has had the opportunity to function as designed and risks weakening the very protections the Act was intended to provide.

For these reasons, I respectfully urge you to oppose SB 645.

Thank you for your time and consideration.

Respectfully,

Lore Lyon Rosenthal, 2R Gardenway, Greenbelt, MD 20770. [SimplicityGroupsMD@gmail.com](mailto:SimplicityGroupsMD@gmail.com)

Sign Language Interpreter

**\_SB0645 -PCRID - Unfavorable .pdf**

Uploaded by: PCRID Vice President Boykins

Position: UNF

Potomac Chapter of the Registry of Interpreters for the Deaf, Inc.

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## **Education, Energy, and the Environment Committee**

Maryland Senate

Maryland General Assembly

Annapolis, Maryland 21401

### **SB0645 - State Board of Sign Language Interpreters – Membership and Licensing Position: Unfavorable Unless Amended**

Hearing Date: Thursday, February 26, 2026 - 1:00 PM

Submitted by: Potomac Chapter of the Registry of Interpreters for the Deaf (PCRID)

The Potomac Chapter of the Registry of Interpreters for the Deaf (PCRID) is a professional association representing sign language interpreters in Maryland. PCRID supports licensure as a consumer protection framework and writes in opposition to due to **Senate Bill 645** structural concerns outlined below.

**Senate Bill 645** proposes substantial structural amendments to the Maryland Sign Language Interpreters Act, originally enacted through Senate Bill 346 in 2023.

The Maryland Interpreter Licensure Act created a carefully balanced licensing and regulatory framework within the Office of the Deaf and Hard of Hearing, establishing a seven-member board composed entirely of Maryland residents who are proficient in American Sign Language and who reflect the lived and professional realities of the Deaf and interpreting communities.

The proposed Amendments in SB 645 significantly alter that structure. They expand the Board from seven to eleven members, exempt four members from the ASL proficiency requirement, insert two Cabinet-level Secretaries as ex officio members, modify quorum language, delay implementation deadlines, and impose a pre-promulgation reporting requirement atypical to Maryland occupational licensing boards.

These changes are not merely technical adjustments. They fundamentally reshape the governance structure, regulatory authority, and operational independence of the State Board of Sign Language Interpreters. When viewed collectively, the amendments raise substantial concerns regarding regulatory capture, institutional influence, statutory inconsistency, administrative feasibility, and an overall departure from Maryland's established licensing norms.

Licensure was enacted in 2023 as a consumer protection framework in response to documented harms experienced by Deaf Marylanders across the state including in medical, legal, educational, governmental, and community settings. Any amendment should be evaluated against that foundational purpose. The question before the legislature is not whether implementation presents challenges, but whether restructuring the Board in this manner advances or undermines the consumer-protection intent that justified licensure in the first instance.

The following analysis outlines specific structural, legal, and practical concerns raised by the proposed amendments.

## II. Structural Concerns Regarding Board Composition

### 1. Ex Officio Cabinet Level Members Imbalance

- It was explained to the PCRID Board that: the two Cabinet Secretaries were designated as ex officio members because ODHH lacks sufficient resources to successfully implement licensure. However, due to the statutory limitations on Board and ODHH roles, changing who sits on the Board does not inherently increase ODHH's administrative capacity. Board membership determines governance structure; it does not create staff, funding, licensing infrastructure, enforcement personnel, or regulatory drafting support.
- The inclusion of the secretaries, even with non-voting status, significantly alters governance dynamics. The SBSLI is housed within ODHH serving as its administrative home. ODHH does not sit hierarchically above Cabinet Secretaries. This creates an awkward and atypical structure in which ODHH must support and coordinate a board that includes higher-ranking executive officers whose agencies may be affected by the Board's regulatory decisions. This hierarchy may lead to undue (even if unintentional) influence. This risk we cannot ignore simply because they are non-voting. If non-voting members had no influence, their inclusion would serve no functional purpose.
- Restructuring the Board by adding external executive branch authority is an approach atypical in other licensing bodies in Maryland, as it risks blurring the line between independent regulation and executive branch policy influence. This is counter to Maryland's established standards for occupational licensure and opens up other boards to similar restructuring.
- To function effectively as a consumer protection body, a licensing board must retain structural insulation from entities that employ, contract with, or rely upon its licensees. This structural change places regulatory authority alongside service-delivery interests and may weaken the Board's ability to enforce violations impartially and without external influence.
- If the concern is implementation capacity, a more statutorily aligned approach would be to address staffing, appropriations, technical infrastructure, or statutory authority directly. Altering Board composition changes governance dynamics but does not expand operational capacity. Without corresponding structural support to ODHH, the amendment does not resolve the stated implementation concern.

## 2. General Board Composition Changes

### a. Clarification of Quorum

If the intent is for the two Secretaries to serve as nonvoting, advisory members, we respectfully request the statute separate them from the voting membership and specify that they are excluded from quorum calculations. We were able to find statutory examples and have modified the amendment as an *example only*:

**9-2411.**

**(a) (1) The Board consists of 9 voting members appointed by the Governor and 2 non-voting ex officio members.**

*OR:*

**(a)(1) The Board consists of nine voting members appointed by the Governor.**

**(2) In addition to the nine voting members, the following individuals shall serve as ex officio, nonvoting members of the Board:**

- (i) The Secretary of Disabilities, or the Secretary's designee; and**
- (ii) The Secretary of Labor, or the Secretary's designee.**

*QUORUM:*

**(c) A majority of the voting members of the Board then serving constitutes a quorum.**

### 3. Expansion of Board Membership: § 9–2411(a)(2)(vi)

Expanding institutional and agency-affiliated representation on a regulatory board increases the structural risk of regulatory capture, where regulatory decisions may gradually reflect the operational priorities of regulated entities rather than the consumer protection purpose of the statute.

Furthermore the additional members as listed in § 9–2411(a)(2)(vi) are 2 individuals who “ shall be affiliated with an entity that operates and implements Deaf services in an educational, legal, or medical setting.” This leaves ambiguity as to what defines affiliation. Additionally these individuals are not held to the ASL proficiency requirement. This blanket exemption increases the chances of individuals who have not demonstrated an understanding of the interpreting profession or needs of Deaf consumers, the priorities of the act or the individuals the board has a named fiduciary responsibility to.

**These two individuals will be affiliated with entities that:**

- Operate Deaf services
- Likely contract with interpreters
- Likely bear compliance costs
- Are subject to Board regulation (directly or indirectly)

**This risks:**

- Standards being shaped around institutional feasibility
- Regulatory thresholds influenced by operational constraints
- Emphasis on access logistics over competency thresholds

Shifting the board from the established priorities of the Maryland Interpreter Licensure Act as Enacted as well and Maryland's Established Occupational Licensing Board Standards and Priorities.

## 4. Board Power Imbalance and Institutional Influence

While the members appointed under § 9–2411(a)(2)(vi) will hold equal voting authority numerically, governance influence is not limited to formal vote counts. The real world practicality cannot be ignored. With 4 members who are exempt from the ASL proficiency requirement, deliberations can shift toward English-dominant discussion to accommodate non-ASL-proficient members. This changes the functional dynamics of participation.

Statutorially, these members are affiliated with entities that operate Deaf services in medical, legal, and educational settings sectors directly affected by licensure standards and enforcement. Sectors who have historically opposed licensure and benefit from weaker standards or no licensure at all. This increases the risk of institutional priorities shaping regulatory outcomes.

Notably, these entities have consistently opposed licensure including during the 2023 Legislative Session. Their inclusion on the Board therefore raises structural questions about whether the regulatory body will remain primarily focused on consumer protection and competency standards, or whether implementation feasibility for institutions will exert greater influence.

This is not to target any one individual's intent, but to call out a structural design flaw. When entities affected by regulation participate directly in regulatory governance, this can result in regulations favoring governmental bodies preferences over consumer rights.

Numerous Deaf individuals testified about failures in medical, legal, and educational settings and the lack of accountability mechanisms for unqualified interpreting. This bill was enacted because of the failures in this section even after years of the Deaf community appealing directly to these bodies. That testimony became the basis for establishing licensure as a consumer protection framework. Even if unintentional, this restructuring undermines the original intent of the bill and why it was enacted.

The Maryland Association of The Deaf (MDAD) proposed the following amendment as a cure to this imbalance and PCRID supports its adoption:

**(VI) TWO SHALL BE AFFILIATED WITH AN ENTITY THAT OPERATES AND IMPLEMENT ~~DEAF~~ SERVICES IN AN EDUCATIONAL, LEGAL, OR MEDICAL SETTING WHO ARE INTERPRETERS OR HAVE PROFESSIONAL EXPERIENCE WORKING WITH INTERPETERS OR A DEAF PERSON;**

**(2) EXCEPT FOR THE EX OFFICIO MEMBERS ~~AND THE MEMBERS UNDER SUBSECTIONS (A)(2)(VI) OF THIS SECTION~~, be proficient in American Sign Language.**

We believe this amendment acknowledges the need for Board members with specialized experience in these areas while maintaining Maryland's standard of practitioner-led boards focused on consumer protection.

# III. Pre-Promulgation Reporting

## 1. Signalling Mistrust

- The proposed pre-promulgation reporting requirement represents a significant departure from Maryland’s established regulatory framework.
- The Board is already authorized to create regulations under Md. Code Ann., State Gov’t §§ 9–2414–9–2415 (2023). Under the existing law, regulations are subject to the standard Administrative Procedure Act process, including public notice, comment, and review by the Administrative, Executive, and Legislative Review (AELR) Committee prior to publication in COMAR.
- The reporting requirement adds an extra step outside of the established **Administrative Procedure Act (APA)** → **AELR review** → **COMAR**. This imposes an oversight hurdle unique to this board, and not seen on other professional licensing boards.
- Due to the departure from established norms, this process signals mistrust in the board's competency and regulatory ability. We cannot ignore the implications of imposing this unique procedural barrier on the only Maryland Occupational licensing board whose members are all under protected classes and operate professionally and/or personally in a language other than English.
- Structural oversight mechanisms should be applied uniformly, not selectively.
- The MD Open meetings act requires much of this work to be done during meetings as they cannot even have a running thread that meets quorum. This creates a procedural impossibility.

## 2. Practical Concerns

- The reporting requirements themselves illustrate a fundamental misunderstanding of the interpreting field and the nature of available data.
- The Sign Language Interpreting Field has long been misunderstood. It is a profession with over 90% of its practitioners from marginalized communities whose consumers are a systemically oppressed and underrepresented group. A combination of limited resources, funding constraints, systemic isolation, and institutional deprioritization has resulted in a significant dearth of available data.
- The field of sign language interpreting has historically lacked centralized tracking systems for:
  - specialty practice delineation
  - consumer utilization patterns
  - harm metrics across settings
  - workforce distribution by specialty
- The absence of reliable data and consistent professional standards across the field is precisely why licensure was enacted in 2023, to create accountability, complaint pathways, and minimum competency standards.
- If such data were readily available and systematically collected, the professional landscape would look markedly different and many of the documented harms shared by Deaf Community members during the 2023 legislative session would not have occurred.
- For years Deaf people have called for:
  - local and federal census bureaus to meaningfully track Deaf populations,
  - for the Department of Education to standardize the tacking of Deaf students,
  - for interpreters to be required to be listed in a publicly accessible database as other professions are.
- Ironically the requirement to collect this data, underscores the existing burdens the Board and community have been highlighting for years. The establishing of this reporting requirement signals that the legislation is not listening. Deaf needs are not prioritized, therefore the data is not there.

## 3. Scope of Analysis

- The required report effectively demands:
  - a. comparative analysis of multiple national and regional certification bodies,
  - b. interpretation of how each defines or limits specialty practice,
  - c. reconciliation with Maryland statutory scope language,
  - d. policy and economic evaluation across legal, medical, behavioral health, tactile, language-pair, and conference settings.
- This level of analysis calls for Subject Matter Experts in each domain listed. Notably, there is no requirement for board membership (including the expanded board) for competency in any of these areas.
- This layer alone reads as a systemic delaying of enforcement to please institutional stakeholders while harm continues to be caused within the daily lives of Deaf individuals.

## 4. Cart Before the Horse

Most importantly, the practical barriers to producing the required report underscore the very need for licensure. The Deaf community advocated for licensure to establish minimum competency standards, accountability mechanisms, and enforceable qualifications precisely because the field historically lacks centralized tracking, specialty delineation, and uniform standards. The proposed amendment would require interpreters present for the facilitation of data collection, stakeholder consultation and speciality analysis. These interpreters would need competency in the complex domains of: legal, medical, and behavioral health settings.

Yet, without established specialty standards or licensure-based metrics in place, there would be no objective mechanism to ensure that the interpreters facilitating those discussions possess the requisite subject-matter expertise.

This creates a paradox and another gridlock: the Board would be required to rely on interpreter expertise in specialized settings in order to determine whether specialty standards are necessary, while lacking a formal system to verify that expertise. Absent clear qualification metrics, there is a real risk that interpreter incompetence or uneven proficiency could negatively shape policy outcomes.

## 5. Imposes a White-Paper Level Analytical Burden

Each individual requirement named in this section is a feat in itself:

### **(I) HOW NATIONAL AND REGIONAL CERTIFICATION STANDARDS DEFINE OR LIMIT SPECIALIST AREAS**

- The terms Define or Limit as used in this section would call for legal analysis and conclusions
- RID, NAD, BEI do not uniformly define specialist areas in a way comparable or consistent with statutory frameworks.
  - These bodies intentionally do not define the scope of practice for their credentials instead allowing jurisdictions to make determinations to accommodate their populations.
  - RID credentials reflect competence assessment.
  - BEI varies greatly state to state
  - NAD has shifted focus from interpreter credentialing to Deaf and consumer advocacy.
- International testing validity standards require regular job task analysis to determine that the test is adequately assessing key performance indicators. Many of these tests have not had JTAs in years and most specializations are no-longer offered. Therefore any specialist limitations stated would not meet established standards of reliability even if they were plainly stated.
- The Board would need to:
  - Interpret external private credentialing standards
  - Assess their legal scope
  - Determine preemption or compatibility issues
- Notably this report must reconcile the existing ambiguity in § 9-2422 which would require legal analysis.

## **(II) NUMBER OF INTERPRETERS IN THE STATE AND NEIGHBORING STATES CERTIFIED IN SPECIALIST AREAS**

- This requires compilation of data that is not publicly available, if reliably tracked at all.
- Data Access: Maryland does not house an interpreter database, have control over national certification databases, nor has any legal authority to compel this information.
- Neighboring states do not reliably track this data
- What counts as a specialist area is not consistently applied jurisdiction to jurisdiction or from one certifying body to another.

## **(III) EVALUATION OF HOW SEPARATE REQUIREMENTS MAY IMPACT ACCESS**

- This requires Economic and Policy analysis
- Access to Sophisticated Workforce modeling
- Access-to-services forecasting
- ADA, FERPA, IDEA, Maryland Disability Law compliance analysis
- Economic forecasting knowledge
- The board is required to create a report, therefore they cannot simply use statements made by stakeholders regarding impact. As a regulatory body tasked with this, the report is expected to be independent analysis.

## **(IV) RECOMMENDATIONS ON WHETHER, AND IN WHAT FORM, SPECIALTY LICENSURE SHOULD BE IMPLEMENTED**

This requirement requires expertise several domains, including:

- Public Policy
- Licensing analysis
- Legal justifications
- Comparative review across jurisdictions

## **(V) (2) IN COMPLETING THE REPORT UNDER PARAGRAPH (1) OF THIS SUBSECTION, THE BOARD SHALL CONSULT WITH STAKEHOLDERS, INCLUDING:**

- |   |                              |
|---|------------------------------|
| - Maryland Department of Health         | - MSDE                       |
| - Maryland Association of the Deaf      | - MSEA                       |
| - Maryland Hospital Association         | - Public Schools Association |
| - Interpreters and Interpreter agencies | - Department of Disabilities |
| - Maryland Judiciary                    |                              |
- No interpreter organization is specifically named.
  - Disproportionate representation of state agencies and departments
    - a. Representation governing institutional stakeholders over consumer-protection entities.
    - b. These agencies were criticized in 2023 for continual use of unqualified interpreters which supported the passing of this bill and underlined its urgency and now they have a statutory input in standards.
    - c. The power imbalance now favors the service deliverers over consumer protection - the intent of licensure.
    - d. This once again signals institutional stakeholder priorities over consumer protection and rights.

## VI. PRECEDENT IN MARYLAND LICENSING GOVERNANCE

- Maryland Occupational Licensure standard practices:
  - a. Entrust boards with establishing specialty requirements by regulation
  - b. Utilize the existing (APA)→ AELR review → COMAR review process
  - c. Are not required to produce formal policy analysis even when data is readily available.

This amendment is atypical and warrants substantial justification to avoid signaling that Maryland is prioritizing institutional interests over the established civil rights protections afforded to Deaf individuals under Americans with Disabilities Act, The Individuals With Disabilities Education Act, and the Rehabilitation Act of 1973. More importantly it prioritizes these interests over Maryland's own ethos as shown in: The Maryland Fair Employment Practices Act, Maryland Public Accommodations Law, Maryland Education Article § 8-401 and the powers and duties invested in Governor's Office of the Deaf and Hard of Hearing. Several of these protections predate federal standards such as the ADA, illustrating Maryland's independent commitment to safeguarding the rights of individuals with disabilities.

**By adding pre-reporting mandates outside the standard APA process, the amendment creates a structural hurdle that effectively impedes the Board's ability to establish specialty licensure standards.**

## IV. In Support of Alternative Qualifications

In prior versions of SB 645, the following proposed amendment from SBSLI and the original bill drafters was omitted. It was introduced on February 24, 2026 during the final drafting of this letter. PCRID acknowledges its support for the following provision:

PCRID supports the proposed amendment to § 9–2419(3), State Government Article, replacing “and” with “or,” thereby allowing licensure based on alternative qualifications established by the Board in lieu of nationally or regionally recognized certification. We believe this amendment is an important step toward ensuring comprehensive licensure. As discussed elsewhere in this letter, the Board must retain the authority to establish standards in specialty areas where national certification pathways are limited or insufficient in order to safeguard consumer rights and protections.

## V. Implementation Delays and Real-World Impact

We have seen this in action already with the working group meetings and even within the meetings with the governor's office. Each meeting has illustrated the structural challenges present in Maryland. In multiple instances, Interpreters assigned to complex policy discussions lacked demonstrated specialization in governmental or legal settings. The resulting miscommunication created significant delays in progress and can unequivocally be named as one source of the ultimate impasse.

This section should not serve as an indictment of individual interpreters, but instead as evidence of the larger systemic gap. Even within high level policy discussions impacting interpreting licensure itself there were no enforceable mechanisms to ensure interpreters assigned had demonstrated competencies required of these settings. The impact of unregulated interpreters within this amendment process alone, underscores the need for licensure.

It is clear that my meetings with Maryland Government Officials have been smoother allowing us to reach consensus and shared objectives. The difference in my experience is not one of qualification, but of access. I did not have to entrust my voice or understanding to an interpreter. My Deaf colleagues, however, had to navigate the additional layer of interpreter dynamics and qualifications along with cultural mediation. Interpreters in policy discussions affect timing, nuance and authority. When an interpreter lacks the skills necessary for the space, the consequences will materially affect both participation and policy outcomes.

We are not only observers in this dynamic, we are experiencing first hand, in real time. The challenges encountered during these meetings reflect what a Deaf person navigates daily in every corner of their life. If you have any resulting frustrations, fear of misrepresentation or misunderstanding, regrets or frustrations that understanding and consensus could have been reached sooner, you now have a tangible, professional and emotional connection to what my Deaf Colleagues and community members have expressed for years.

As an interpreter, I must constantly remember that my job is someone else's life and that my choices have real world impacts.

**If you take nothing else from this process, please take this: minimum competency standards are not procedural hurdles, calls for speciality licenses are not intended as an administrative or financial burden. They are necessary safeguards to ensure one's rights, dignity, equity, and meaningful participation.**

For the reasons stated above, PCRID respectfully urges the Committee to issue an unfavorable report on SB0645 unless amendments are made to preserve the integrity of the original bill.

Respectfully submitted,

Carolyn Boykins

Vice President  
On Behalf of the PCRID Board and Members  
vp@pcrid.org

# **Weinstock--Written-Testimony-in-Opposition-to-SB06**

Uploaded by: Robert Weinstock

Position: UNF

February 24, 2026

Senator Feldman, Senator Kagan, and members of the Maryland Senate Committee on Education, Energy, and the Environment:

I am a deaf citizen of the State of Maryland, and a member of both the Maryland Association of the Deaf and the Potomac Chapter of Registry of Interpreters for the Deaf. I live in Takoma Park, in District 20, and am represented in the Senate by Sen. David Moon.

I am writing to you today to oppose the proposed SB0645, State Board of Sign Language Interpreters (SBSLI): Membership and Licensing. This bill, as now written, raises serious concerns for the Deaf, DeafBlind, and hard of hearing communities, the members of which are directly impacted by the decisions made by the State Board of Sign Language Interpreters (SBSLI).

Specifically:

- This bill dilutes Deaf, DeafBlind, and Hard of Hearing representation on SBSLI. It is my strong belief that the individuals most directly impacted by the Board's decisions must retain meaningful representation and authority in matters affecting their access, safety, and civil rights. A time-honored tenet in the Deaf community is "Nothing about us, without us," and this is demonstrated in many nonprofit organization boards and other policy and decision-making groups by their requirement of majority and/or significant cross-section deaf representation.
- The bill increases representation from groups that have historically caused significant harm to the Deaf, DeafBlind, and hard of hearing communities. This contradicts the original purpose of SBSLI, which was created to protect consumers of sign language interpreting services and prevent further harm.

Increased restrictions on SBSLI, particularly through expanded collaboration with stakeholders such as state agencies, may weaken consumer protections and undermine the rights of Deaf, DeafBlind, and hard of hearing individuals, potentially leading to further harm.

The original licensure law and current regulations are the result of more than 15 years of collaboration among Deaf, DeafBlind, and hard of hearing community members and key stakeholders. These policies were carefully crafted to ensure consumer protection and uphold professional standards. Making sweeping changes at this stage undermines that work and continues a longstanding pattern of marginalization.

I respectfully urge you to oppose this bill.

Thank you for your time and careful consideration of this important matter.

Robert B. Weinstock  
508 Lincoln Avenue  
Takoma Park, MD 20912  
[rweinstock@gmail.com](mailto:rweinstock@gmail.com)

**Official PCRID sb 645 testimony (1).pdf**

Uploaded by: Shelby Abdilah

Position: UNF



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*