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SBSLI
Town Hall Meeting
Baltimore, MD

Monday, December 9, 2024

6:00 – 8:30 p.m. ET

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SBSLI Town Hall

December 9, 2024

6:00 p.m.

JACOB LEFFLER: Hello, everyone, and welcome to the State Board of Sign Language Interpreter Board Town Hall. Today is December 9, and we're very excited to start with some discussion regarding some of the specific recommendations. We will go through some more things in detail as we go through the PowerPoints.

At the end of the presentation, we will have some time for questions. So please hold your questions until the end. Thank you. And thank you all for your time.

Now I will turn it over to Tanea Brown for some of the house rules.

USHERLA DeBERRY: Good evening, everyone. My name is Usherla DeBerry. This is how I'm referred to in ASL. I'm Director of the Governor's Office of the Deaf and Hard of Hearing. I want to welcome everyone here this evening, and thank you to Gateway for welcoming us here this evening.

Some housekeeping. In the event of an emergency, please make sure you exit the doors in the back. See Dave with his happened up there in the back of the room.

Restrooms are located, if you go out the front door here, you make an immediate right and then another right, and you will see the restrooms in the hallway.

We have interpreters in various areas throughout the room. From ASL into English, our interpreters supporting our CDIs for the recording, and we also have CART available this evening. In addition to that, we have deafblind and close vision interpreting.

Am I missing anything?

Again, thank you, and if there's anything you need, let us know.

The show is yours, Jacob.

JACOB LEFFLER: Thank you, Usherla.

Next slide.

This is the agenda for today. We will start off with the board makeup, what that looks like, some of the goals for the board, then move on to some regulations. We'll explain the grievance process as well as the web portal. And we will hold questions to the end. That's our agenda for the evening.

Next slide, please.

This is the current makeup of the board. My name is Jacob Leffler. I'm the board Chair.

LESLIE PUZIO: Hello, good evening, everyone. I would like to introduce myself. My name is Leslie Puzio. This is my name sign. For a visual description, I have blond hair, I am a white female, with a black turtleneck on and gray pants.

I am a general community member of the board as well as serving as Vice Chair. So thanks for being here.

JACOB LEFFLER: I realize I should have described myself as well. I'm wearing a black shirt with jeans, white male with brown hair and glasses.

We do have three current board members who are not here today. They had other commitments. That's Sue Beaver, community member. Ritchie Bryant is the MDAD representative, Maryland Association of the Deaf. And we have Paige Bradford, deafblind representative.

We have two vacancies currently on the board, a community member vacancy as well as a PCRID representative. Potomac Chapter of the RID. Those are the two vacancies at this time. We're make something selections and currently changing out some of our board members. That process is still ongoing.

So current status. We are looking at some of the regulations and we are preparing the web portal for the registration process.

Next slide, please.

The goal for this board. We are overseeing the responsibilities placed on the board by the law and state of Maryland. We want to set the standard for the quality of interpreters here in the state of Maryland. And our goal is to elevate the quality of life for Deaf, deafblind, and hard of hearing community members. That is our responsibility and our Board goal for this board.

Now we'll move into some of our regulations. There are two parts of this, the general license as well as the provisional general license. This does refer to agencies and businesses. There is a specialty license for education as well as for provisional license in education. We have seen many questions in the past and some of those will be up here on the board.

Moving on to the next slide.

This will be about the general license.

Some of the requirements, you must have a national or regional certification. For example, RID certification or the BEI or the NAD level III or above.

We are currently working on some other criteria regarding the full license. So we will be sharing that at a later date. We do have a board meeting next week.

Regarding the RID certificate, there are no aspects for K-12 education. And the fee for this application is \$150. The renewal fee every two years will be \$100.

Next slide, please.

We're going to talk about the general knowledge and ethics exam. A provisional interpreter must be accompanied with a licensed interpreter for a mentor. The cost will be \$300 for 3 years or a renewal, a one-time 2-year renewal for \$100, and after that, if you haven't gotten a license by that time, we're sorry, but that's the end of the process.

Most of the questions have been related to general and provisional licensing. Any exceptions. That question has come up. We don't have any exceptions at this time.

A question has come up as to whether or not it applies to both Deaf and non-Deaf interpreters. Yes, it does.

The question has come up as to whether CASLI is applicable to this situation. Yes.

And the next question is does it apply to government property settings. Yes.

As far as being a freelance or agency and working in a school environment, a license is still required.

Next slide, please.

LESLIE PUZIO: Hi, hello, this is Leslie speaking.

Next slide, please.

Thank you.

For agencies and businesses, one second. An agency or a business is required to have a license as well. An agency or business is defined as if you hire or place interpreters. Many interpreters set up LLCs or sole proprietorships. That being said, if you are hiring or putting other interpreters on a schedule, you do not count as an agency. If you are an agency with an LLC and do you bring on other interpreters for assignments, then do you have to register for a business or agency license. That's the differentiation.

When you register as a business, under the Governor's Office of the Deaf and Hard of Hearing, you will be required to be registered either in the state or operating in another state if you provide services within the boundaries of the state of Maryland. You'll have to verify that.

In addition to that, will you have to prove that you are in good standing in the state of Maryland, which has a directory to show if you are in good standing and not in arrears with your taxes.

Agencies and businesses also include VRI interpreting services. That being said, if you are in the state of Maryland and you're providing services in the state of Maryland, however, you are contracting interpreters from another state, if they are providing services in the state of Maryland, regardless if they live in California, they have to be registered and be licensed in the state of Maryland for the consumer protection of individuals within the state.

All interpreters, regardless of where the service is provided, have to be sure they're providing services in the state means they are licensed.

We do not provide any oversight to VRS, which is provided by the FCC. So this licensure did not include VRS.

Fees for agencies/business application. The initial application fee is \$250, and then the renewal fee is \$200 for an agency/business.

Now, we have been compiling a lot of questions via email and various town halls and board meetings up to this point, and we've curated those on our website as well. These are questions that came specifically from the virtual town hall that we hosted. Again, clarification on who is considered an agency. An agency is an entity that hires contracted interpreters. So if I am directly hired, if I Leslie go to provide services as an interpreter, I do not have to be licensed as a business.

If I ask another interpreter to go to an assignment, and I coordinate that, then I do have to register for a business license.

Another question was about interpreters working at hospitals. If you are a staff interpreter, does that hospital then have to have a license as a business. No. The interpreters need to be licensed but not the hospital proper. An exception to that is Gallaudet University. They have staff interpreters. In addition to that, they also use Gallaudet Interpreting Services. Gallaudet University is not required to be licensed as a business. GIS is required to be licensed as a business. So the hospitals themselves if they have staff interpreters, they are not required to have a business license, but the interpreters themselves have to have a license as an individual.

Now, we've talked about the concept of in good standing. Each state has a registry and records of businesses that operate in their state. And when an agency or business registers for a license, we will pull up and verify that that business is, quote/unquote, in good standing. That will happen annually, not just at the initial application.

How do agencies, how do we make sure there's accountability? Really and truly, it's going to be up to the consumers, it will be up to ODHH. The agency is ultimately accountable, as are the interpreters and a consumer. If you go to an agency and they provide you with an unlicensed interpreter, please file a grievance with ODHH. We will talk about that more later, but it's important for all of us to protect ourselves and each other to ensure agencies are held accountable.

Now, a question came up about how we can identify whether an agency is licensed or not. That's a valid question. Interpreters who are signing up as freelancers with an agency or brought on board as staff, my suggestion is to bring up the registry which will be housed under ODHH. So you would type in the name of the agency to see if they are licensed. Very similar concept to RID. If you go to RID's website, they have a list of all certified interpreters. That's a way to verify that. Same concept when it comes to businesses. So when you sign up to work for an agency, I would verify and do my due diligence, and then maybe a suggestion would be, put it in your phone as a calendar reminder to check the next year to ensure they renew their license and still have good standing in the state of Maryland.

Next slide, please.

Now, the only exception for licensure right now has to do with education. We have a full educational license and then of course we have provisional license e ensure. We will speak more to that. The educational license, there are three options to be able to obtain said license: RID national certification, regional certification, or an EIPA score 4.0 or above. The specialization, elementary or secondary, PSE or ASL, does not matter. You can be any of those. It has to be 4.0 or above.

Now, we certainly recommend interpreters who do not yet have EIPA to be cognizant of the setting they work in and take the exam that concurs with the setting you currently work. We recognize that school interpreters are often shifted between grades, but when possible, if you know you primarily work in elementary school setting, take that EIPA test.

In the event that an interpreter only has an EIPA, that means they can only be licensed to work in K-12 education settings. Our definition of education is birth through 21. It doesn't necessarily say K, but we say birth through early intervention programs, family ed programs, with many Deaf children. So we are defining education as birth through 21 in the state of Maryland.

Now let's talk about the specific settings educational interpreters can work in. It is any academic or school setting for children. That could be in a classroom. It could mean after school activities. It could be a school play, so on and so forth. Those are included.

That being said, if it is a Deaf teacher in a birth to 21 setting, that does not apply. It is only for children if you are educationally licensed.

If it's an IEP meeting, then that's different. If it's an IEP meeting with parents who are Deaf, general licensure would be required versus an IEP meeting and you were interpreting for the student.

The fees. The initial application fee is \$75 with an annual renewal fee of \$50.

The requirement for an educational license, there will be a requirement of a CEU in education. And out of that 1.0 CEU, .5 has to be in PPO, power, privilege and

oppression, such as in culture, Deaf awareness, or diversity. Be cognizant of this cycle as it is different from the general licensure cycle.

The cycle begins when you register and get your license. We can forward this slide deck if necessary.

For the provisional education license. If you do not have a national or regional certification or 4.0 on the EIPA, you still can work in the educational setting. Caveat being you have to have passed the written portion of the EIPA test first. The length of the provisional license is 3 years. If you still have not obtained the satisfactory score of 4.0 or above or another certification requirement, you can have an option of a 2-year extension, which is a total maximum of 5 years which aligns with CASLI's 5 years.

The fee for the provisional license initial fee is \$150. And that's for that first 3-year period. And then if there's a need for an extension, it's a \$100 charge for the 2-year renewal.

Next slide, please.

Some frequently asked questions. First is defining an educational setting. Again, any programs or services by state-funded schools or private schools, this is where that license applies.

The definition of education is birth to 21, just to reiterate that.

There's a question about how recently you have to have taken the written test. The written EIPA never expires, so technically you could have taken it 15 years ago and it would still hold. So there is no expiration date for that. If you have passed the written portion then you satisfy the requirements for a provisional education license.

An interpreter may not work outside the boundaries of educational settings if they only have an education license. If they are nationally certified, then they can apply for a general license as well as an educational license, which means they can work across the gamut anywhere. However, if they only have an educational license, they are relegated to only working in the birth to 21 K-12 setting.

Another question was related to if there's any educational requirements on the part of the interpreter. We know that there are people who have been working in the field for many, many years, and RID does recognize that there is no educational degree versus an AA versus a BA. We are going to follow in kind. So what that means is many interpreters we recognize do not have a degree, but they may still be qualified or certified and therefore we cannot require that.

Again, we are looking at assessing the skills for education which is why we are using the EIPA.

And again, educational settings where those interpreters can work are anywhere on the campus as it relates to the academics or school setting. That could be during

instructional time or after school activities or other activities during the day, plays, anything where the students are involved.

If there is a Deaf teacher in that school, it does not apply to that Deaf teacher. Someone has to have a general license to interpret for a Deaf adult. The educational license applies only and specifically to children.

If an interpreter has a general license as well as an educational license, they could be assigned to work with a Deaf teacher or for an IEP or for any other Deaf adult that might be interacting in that particular environment.

All right. The grievance process. One second.

Next slide.

Now, this slide is not all encompassing. This is based on recent information from ODHH and the AAG's office, who will provide some additional clarification. There was a concern about if a grievance is filed, would that interpreter's license be automatically suspended. The answer to that is no. There will be no suspension or no punitive actions taken until an investigation happens. So just because a grievance is filed does not mean that interpreter can't work.

In addition, no grievance can be anonymous. An investigation must take place around that grievance, and therefore anonymity is not going to be possible.

When the Governor's Office of the Deaf and Hard of Hearing receives a grievance, they will have a complaint or a compliance officer that will work collaboratively with the board. That CO will collect all the facts and information so that all the required documentation exists. The CO will ensure that aligns with the state of Maryland in terms of whether it is a violation. The CO will determine whether or not a violation has taken place.

If it is found that a violation has taken place, they will give recommendations to the board, who will decide yes, there's a violation.

And in the law, there are six things that are detailed in terms of what can be included within a grievance. And it's very much outlined. There's a link to the law where you can see what is included within the statute.

Now, when a grievance happens, and if the CO says that, yes, there are facts to support a violation has taken place, then the board can determine whether or not a license is suspended or revoked, whether restorative justice has to take place, whether perhaps there needs to be some remedial education like a workshop, for example.

And then the board will inform the respondent, the person who has had the grievance filed against them, and they will have the opportunity to have an appeal. And that will go to the Office of Administrative Hearings, OAH, who will make the final determination on said appeal if that's the direction the grievance goes.

We have our AAG, and I'm sorry if I mess up your last name. Ethan Sonnenstrahl. Did I spell that correctly? Yea! We have Ethan with us to provide any clarification about the grievance process. Ethan?

ETHAN SONNENSTRAHL: Hello, everyone. My name is Ethan. And I am a light skinned man with black hair, blue shirt, gray suit. And I currently work as the Assistant Attorney General. I work for the state of Maryland and I work closely with GODHH and have for a number of years. We've gotten some complaints regarding this grievance process. And I agree with Leslie here. The complaint process, does that mean we automatically rip up your licensure? No. We do have due process we are required to follow as a part of your constitutional right. So you all do have the right to go through due process and there will be a letter that will detail the specific penalties, allegations against you. So as it is your right, you are able to ask for a discussion with the Office of Administrative Hearings. And the OAH oversees any sort of hearing or process that takes place in Maryland. They do have a fact finding process in their office.

A report will be compiled. For example, if an interpreter is drinking on assignment, that would violate our laws. But there are always two sides. So the interpreter could provide their evidence, witnesses, documentation, and so forth. If you're unsure of the decision that has been made, there is an appeals process that you can go through, and there are some regulations that we would also give for follow up, specifically 12 regarding the specific processes of the complaints process.

So really what does that look like? Regarding the general public, anyone in the community can file a grievance with GODHH, and we will receive those complaints and review those, see whether they have truly exemplify a violation. So therefore we will have a right to go to OAH. Their process is very, very clear. They have their own regulations to follow as well.

Is there anything more I should describe in the process?

LESLIE PUZIO: This is Leslie. I just want to add to Ethan's comments, there was a question about why even have a grievance process? RID already has a process in place, why don't we just utilize that.

That's a good question. Because we include national, regional, and EIPA, EIPA does not fall under RID's grievance process. The BEI which we recognize does not fall under the RID's grievance process. So there would be no recourse for those certifications. Only those with a national certification can utilize the RID grievance process.

So we have our own state process to cover everybody who can receive licensure within the state of Maryland.

JACOB LEFFLER: Jacob here. There are many items here and concerns that the community has asked me. The first is, what is the list of possible violations and punishments. And the board is still working with ODHH to investigate exactly how that will be enumerated.

As far as the other license processes, do they have a similar complaint process. Do we have an answer on that? The provisional license process having a complaint process? It's all similar. Okay. Everything is similar.

So how will the interpreter know if they've accepted an assignment through an unlicensed situation and what will the repercussions be, how will the referral be sent to the state. That is the process. So the punishment will be on the agency, not the interpreter in that situation. So if the agency is faulty with following the rules, they will punish the agency and not the interpreter.

I believe I answered this item, right?

LESLIE PUZIO: Yes, we covered that.

JACOB LEFFLER: The OAH is this diverse board ensuring buy I don't see doesn't occur. Do we have an answer on this? How do we effectuate this? As far as the diversity?

ETHAN SONNENSTRAHL: Yes, I did just speak to that. OAH has 30 different judges or administrators that currently have a large turnover process. So there's not the same person handling the same cases. They are trained professionals, and they will listen to all of the evidence and everything that is brought to them. And really there are two partitions that go through this process to ensure that everything is based purely on facts and not more so on a decision of what should or shouldn't be done, but looking at the facts of the process, ensuring there is effective documentation to make a fair resolution.

JACOB LEFFLER: Okay.

Next slide, please.

Now I want to talk about internships and practicum students.

Next slide, please.

Internships and practicum students. A student who is not part of the internship program or part of a college program cannot provide interpreting services in these settings: Legal, behavioral health setting, or emergency medical setting, and school settings as earlier enumerated. These items must be are if an interpreter is to do that job, three to be accompanied by a mentor, a licensed mentor.

Next slide, please.

Okay. Now we'll talk about the web portal. And I know serve excited about the web portal. So January 1st is coming up. Tanea Brown has been working on this with the ODHHS office and she's been developing the web portal work, so I appreciate your hard work on that.

TANEA BROWN: Next slide. Thank you. Hello, everybody. This is Tanea. I'm so happy you could be here this evening.

So some of you went to our portal demo event. January 1 we said it would go live. The web portal will happen once the regulations have been published. So those two things are contingent upon each other, and then it will go live.

What's important for you to be aware of is that you need to apply when it goes live. And if you see this website here, onestop.md.gov, that's where you will go to register.

If you missed the demos or want to know more and want to review it, we have a YouTube video with the URL here where you can watch a demo of the portal.

We have been working with the contractor for the last 12 weeks to get that process up and running. Those of you who apply for licensure will be approved through the portal.

Usherla, anything I need to add?

USHERLA DeBERRY: Nope, that looks good.

TANEA BROWN: Thank you all so much.

JACOB LEFFLER: Okay. Thank you. Next slide, please.

FAQs. A lot of questions came in this regard. So when will the regulations be posted on the internet? We're waiting on the ODHH. The board did recognize that we're coming up against January 1st as the promised date, so the law is not effective until the regulations themselves are finalized, which means that we're technically still no good. Once they're published, we will move forward from there.

Anything with respect to the regulations being posted?

USHERLA DeBERRY: Let's see. Yes, thank you. So regarding the regulations, this is Usherla, you will have to wait until we do have those regulations published. Once they are present online, we can move forward with that.

I realize some people are concerned with the process because they were supposed to have been published November 25th. That is what we were informed and we have been informed now that it is not yet ready so we are still working on that process.

When it is ready, we will post it and move forward.

At this time, we are waiting for that to be posted on the website for you all to see that. It will show up on our registry. Whether through DSD or DLLR, that's what we're currently waiting for. We're waiting on COMAR as well.

JACOB LEFFLER: Okay. As far as the regulations, they haven't been posted yet. So the January 1st date we've been setting will be put off. Nobody will be punished under that point because we're waiting for the regulations to be finalized and published.

Other comments?

ETHAN SONNENSTRAHL: This is Ethan. I do understand that many interpreters in this community are concerned regarding the regulations. The law is supposed to take effect January 1, 2025, and how do we know we're following the regulations if they are not posted.

I believe some legislators laid out specific rules in the past. There are still details we are working through. There are agencies responsible to develop those regulations. Like this agency itself, we have our own regulations about a licensure process, how do we get our hours for experience, and so forth. So really the law is dependent on those sort of regulations.

So there are some questions regarding the legislators and the General Assembly which exists as the legislators. Whether the process is effective today, we are still waiting on the agency to establish the regulations. So as of the state board of interpreters licensure board, we are still waiting on that.

So the question is then how are we going to get our license if we don't have regulations established. It would be impossible. So that is an in-depth discussion we are still having at this time. That's why we are not yet effective on our regulations. Though I do want to be clear, this is not legal advice, but if it were to go through, we would have to follow the legislative process for the General Assembly of the state of Maryland in order to implement the law and make it clear for everyone in the community. They would have to make an amendment to what currently exists.

So that is a benchmark that we are still waiting on. Our own agency has regulations to establish as well as the Maryland legislators. They have already made an announcement that the law should not be going into effect as we expected.

JACOB LEFFLER: Someone is asking me about specialty interpreting areas such as medical, legal, mental and behavioral health. Those will not be in effect until we actually made them in September and had a postponement until January '26, so the board will have a meeting and we encourage you to participate as part of that process. We will be making decisions based on the feedback from the public.

How will the interpreters visiting in the state work. If you're working less than 80 hours, you can work here without a license less than 80 hours. You report to ODHH as far as there is enforcement. We are still evaluating on how to develop the rules in that regard. So as far as interpreters who do video work, so how do we know where the agency working and coming from. So we are evaluating to understand exactly how that work flow goes. We're trying to, you know, have people understand what those commitments they make with those agencies are before they make those commitments before they take on those work. So as far as working with the RID and licensing, if you don't have

one in Maryland are you still required to have one. So if you are working or providing a service in the state of Maryland, you must be licensed here.

If I'm working at a church, must I have a license. The answer is yes. If you're being paid, you must be licensed.

So who is responsible for the CASLI online registration, who is accountable for the CASLI reporting period.

LESLIE PUZIO: This is Leslie speaking. I would like to provide a little bit of clarification about the slide. If an interpreter works less than 80 hours within the state of Maryland, is there a requirement. You do not have to have a license; however, you still have to meet the licensing requirements, meaning you can't be uncertified, for example. You still have to hold a national or regional certification but you do not have to apply for a license if you work less than 80 hours.

In addition to that, we know that CASLI as of right now has a less than 2-month period to have results. And EIPA also. That's why that up to 5 years is important for the EIPA because it provides the interpreters for the time they need to wait for their certification results.

Dr. Beth Ann Monn who oversees EIPA testing here in the state of Maryland is currently exploring adding additional locations to expand opportunities for interpreters in the state to be able to have the opportunity to take EIPA to again satisfy that requirement in a timely manner.

JACOB LEFFLER: Next slide, please.

So at this time we're finished with our presentation regarding the regulations, and I will open the floor up to the community, to any members, interpreters or non-interpreters, with any questions that you may have.

We do have some ground rules. Please be sure you are raising your hand or lining up to be called one at a time to deliver your question. Please be sure we are speaking one at a time. And you can use your preferred language, and please don't sim-com or use two languages at once.

Between we want to be mindful of a 2-minute limit for your questions. The floor is open for anyone with a question.

We do ask that you come up front, please.

>> For myself, the reason why I see this parent speaking but the grandparents speaking and the grandchildren are hard of hearing and they go to the school, they do the interpreting.

So my grandson is Deaf and goes to the Columbia campus of the MSD. And there was a situation where there was a mental health emergency that he needed to be taken to

Sheppard Pratt. His parents were hearing. However, his father is a CODA and said well he has amplification, he does not need an interpreter. And I feel like, oh, where is the card? Hold on. Give me one second.

So you see this little card here? The front says "I am Deaf." And on the back, it explains the appropriate ways to communicate with a Deaf person, for example, old-fashioned paper and pencil.

I feel like these need to be disseminated so that parents who are hearing who have Deaf children can use this to educate folks about these children's rights. They have a right, for example, to have an interpreter. The hospital doesn't have authority to blanketly make decisions for these children. So this is what it looks like. Let me see. It says hearing loss health. I think it would be very helpful because hearing parents really force the hand of those hospitals who are not willing to provide interpreters for these children.

LESLIE PUZIO: This is Leslie. Thank you for the comment. And actually, that reminds me. We forgot to mention. Now, the law is focused on sign language interpreters in the statute, but there's also language that says that every Deaf consumer has the right to make the choice whether they want a live, in-person interpreter, or whether they are willing to use VRI.

VRI cannot be forced upon any Deaf individual. Our law states specifically that they have to be given the choice. The Deaf consumer has every right to determine whether they use VRI or a live person.

Yes, it is also of course recommended that you contact, for example NAD to get additional resources in terms of clarifying the federal law, which requires access be provided and that doesn't necessarily mean writing back and forth.

>> Okay. So many hearing parents are not well versed about ODHH or this information or anything to that effect so I think that little card there I just showed you would really help parents be empowered to educate hospitals and require them to bring an interpreter. His father say CODA and even they struggle to explain that to the hospital. So I feel like something needs to be done to that effect. And I think more education, make sure the Deaf children's rights are being adhered to. I'm talking specifically something for the hearing parents who are not educated about the nuances of the law. That's my point.

JACOB LEFFLER: Thank you so much for your feedback. That's a very important comment.

Usherla, did you want to speak to that?

USHERLA DeBERRY: Yes. This is Usherla. So very often we do receive many calls. Many people are concerned about the interpreting services they receive. Not so much the interpreters themselves but what kind, in person or VRI. We get calls from agencies, Deaf individuals, and even interpreters themselves.

Our agency is aware of some of the concerns that the public has. We are still working on what more education we should be providing for Deaf individuals and the rights that they have, because the comments that they are sharing, if they do not have knowledge about the opportunities to file a grievance or complaint process, or whether they can advocate for in-person or VRI services, that's something we can work towards. We do have a representative -- the MACDHH board has a representative, John Serrano. For that very purpose, John has a strong role in advocating for supporting that area. So we have been collaborating with him continually about that. We recognize many parents are just not aware. Including PG County. There are students in a school, 30 plus Deaf students, with no interpreters provide. But they do have a Deaf teacher, but the Deaf teacher is not teaching all 30 students so where is their access to the education? We would like an interpreter in the school but many of the students don't know sign and the staff don't know sign. We are thrilled that you did ask that question for the record. Thank you so much.

JACOB LEFFLER: This is Jacob. I just wanted to add that the board does look for more outreach. We are trying to get more responses from the community, including grandparents. So we will be having more discussions on this.

>> Hello, everyone. My name is Ingrid. My question is regarding Deaf interpreters. We do have quite a number of Deaf interpreters that are trained to have taken many courses in study yet they have not pursued certification. So what are the next steps regarding that? Within the web portal, is there some information that we can establish for that?

JACOB LEFFLER: Both are required to be licensed and certified. If you're not certified, you are supposed to apply for the provisional that goes for 5 years. And then you take the RID or the BEI or otherwise and continue on the process to full certification. So at that point we are setting up our rules and regulations. So once that's ready, we will look at it and you can apply on there. But we have to wait until the regulations are finalized.

>> Okay. That's good. I'll inform everybody. Thank you.

LESLIE PUZIO: This is Leslie. I just want to clarify one additional thing to that point. For our Deaf interpreters, CASLI of course has the knowledge and ethics exam for both hearing and Deaf interpreters that is required. It's the same exam. If you pass that, you qualify for the provisional license. So the CASLI CDI test is one option. And BEI has a CDI version as well.

USHERLA DeBERRY: So this is Usherla. The reason behind that, it was brought up about the web portal process. We realized we couldn't move forward with that until we had regulations to match. So through the application process, all of the fines and so forth, the fees you're paying to go through your licensure process all have to match and look the same. If they don't, that is a big issue. So we're trying to save that for some of the general provisions. As soon as the regs are released, we'll be revisiting that to make sure it all matches up on our end.

JACOB LEFFLER: Okay. We can start a line up here at the front for all those who have questions.

>> Okay. I am a nurse in the state of Maryland. I work at the hospital, plus I work at a school. And so my question relates to that setting. And we were talking about at the hospital you have to be registered and you have to be registered with an agency. I understand that is fine. But I'm just wondering how it will influence the work in the healthcare setting like for myself, I work at the hospital and I work full time, and freelance interpreting is how we obtain the interpreters and we're just trying to figure out if I switch through those different hospitals, that means all of them must have registered with the agency? So like let's just say will it be a problem I'm just wondering how to think about that.

JACOB LEFFLER: Just to clarify, you mean the interpreters themselves working in the hospital setting, they're required to hold a license?

>> Yes. The question was more so about in a healthcare setting. In a hospital. They must be registered?

JACOB LEFFLER: Yes. To clarify, the hospital does provide interpreting services provided separate from the hospital itself. If they have an interpreting agency within, that agency is required to hold a license. The interpreters themselves working as a freelance interpreter working on an assignment, they are also required to hold a license.

>> The hospital is not?

JACOB LEFFLER: Correct.

>> Hello. I'm Sara Yates. I've got two questions. The first one is I have had concerns throughout this process about CODA interpreters being qualified. Of course they need to be qualified. And also for those qualified Deaf interpreters too. So you said in the beginning that there will be an alternative option. Could you elaborate on that alternative option?

JACOB LEFFLER: Come to the next meeting.

>> Shoot!

JACOB LEFFLER: And I will clarify, the board hasn't discussed that in full yet. Next week we will be pushing for that discussion during our regular board meeting.

>> Okay. And my second question is, why, why is there a fee for specializations? Why? I cannot wrap my head around it. We are already struggling. You require interpreters to have all of these things. We have seen new requirements for certified. Now there's specializations. Now you're asking these interpreters to pay an additional fee. I feel like you should be paying them a fee to be completely honest. So can you help me understand the rationale and the reason why there is a fee for specializations, please and thank you?

LESLIE PUZIO: Okay. So two part. First let's talk about the CEUs. We understand that many people have concerns about the different specializations with CEUs and how it is separate from RID CEUs. Any CEUs you receive can also apply to RID, as you know.

The reason for the fee is that some people might want to work in education only. Some folks -- excuse me. Not general education. Some people have a general license. The reason you pay for all the specializations separately is, how do I say, the statute requires of course operating costs being built in. The law also says that the board will establish different options for heritage signers, for interpreters who have been interpreting for a long time, BIPOC interpreters so on and so forth, who may not financially be able to afford or pay for the cost of an interpreting program. So it's for a variety of reasons.

So for general education, again, we only have one specialization currently which is education. And I encourage you all to go to the board meeting next week to see what the board will be discussing as it relates to those other specializations as well as to the current regulation period. So we're looking forward to that. We can't speak to it at the moment.

In addition to that, the fees will help for each of those.

>> I understand the concept of the general license and using that funding to support the community, for example, BIPOC interpreters, heritage signers, so on and so forth. It's all the specialization fees. You are already requiring certain elements to have a specialization. Then to force them to pay an additional fee, that's where I just want the rationale and the thinking related to that.

>> Hello. My name is Shane. My question is related to those fees. It seems to me quite a hot topic tonight. So my question, I have a question and a comment to follow. So my question first: There are many business owners that have established sole proprietorship as an interpreting business. There are people who establish LLCs and individual license holders. Now, I understand the delineation.

Now, regarding the first town hall meeting we had virtually on Zoom, I think there were a number of questions that came up at that time and the clarification was for an LLC holder, if I do set up my own business as an SSP, as a sole proprietor, I want to transition but I am still a sole proprietor, not hiring anyone else under my LLC. Just myself. And I am paying a fee more myself as a solo interpreter? That was the discussion at the previous town hall meeting so I'm just curious.

LESLIE PUZIO: That's a great question. I want to provide some clarification with the concept of an agency. If you are an S corp or an LLC or a sole proprietorship, you might want that to protect yourself.

If you hold any of those and you are the only one providing interpreting services, you are not required to hold an agency license.

If myself, for example, I'm an LLC. And I provide direct freelance interpreting services, but I also bring you in, for example, Shane, to provide service, then I would have to register. But if it's just myself or just yourself, you don't have to do that.

>> Thank you so much. I know there are a number of questions to follow that. Thank you.

>> Hello, everybody. I appreciate you clarifying the CASLI test, when you take it, you have to wait 2 months and then you get the results. I understand that.

My question relates to the state of Maryland. It's a big place. So I recently had to drive from one end, the southeast, all the way to the other, and how many places, where specifically would a person take a CASLI test here in Maryland?

Also, is there a waiting list for signing up for such a test? I want to put my name on a list and just as soon as I am capable of taking it, I want to take that. So just where can that be taken?

LESLIE PUZIO: This is Leslie again. I would have to do my due diligence, but I believe it's the Community College of Baltimore County.

>> So I could sign up right now? I could sign up today?

LESLIE PUZIO: Unfortunately, I am already certified which means I cannot take it again which means I can't even look at the available schedule. I do not have access to that information. I'm not allowed nobody with a certification can retake the test so I can't even see what's available in terms of the testing schedule.

I don't know if the person is here, I don't see them, but, hello... but you can reach out to Audrey at CCBC. She is one of the proctors.

>> The only place in the state of Maryland is telling me no, so what am I supposed to do?

LESLIE PUZIO: That's a great question. And I don't know the schedule, again. I imagine they will be adding additional proctors.

Frederick Community College is in the process of becoming a location site. Right now it's a conflict of interest because I work at FCC on the board. Any agency or business can be a host site and proctor. They just have to reach out to Sean... help me. Where is Bill? Sean... Sean Furman is the contact person at CASLI. Any agency or business can reach out and start the process of becoming a proctor location for the CASLI test.

>> Hello. My name is Rachel. My question is similar to Sara's. So there's a number of things I'm thinking about at this time. Previous town hall meeting I think they were talking about the spectrum of RID medical, for example, regarding an appointment versus a medical emergency.

So my question is who determines to enable a situation as a 1 to a 4 to determine a medical emergency? For an interpreter to go through an agency, often interpreters are asking for more information regarding an assignment and they may not get back to you or the communication drops off after that point, you show up to the job, and you're unexpected or what the responsibilities are. So turns out, oh, you think it's just a level 1 and it turns out to be a level 4. I think it's going to be easy, and now I'm in trouble.

I now feel like I can't work effectively in that situation. That might be a question to hold for next week regarding that, that the information be passed to the agency to fill out and give back to the agency to look over and say, oh, this is a level 3, to make sure we get all level 3 interpreters for this sort of situation to reduce the amount of liability we experience from the interpreter and the agency side. I think that's a general question that many people have.

JACOB LEFFLER: This is Jacob. To answer your question, right now the board did vote back in September that everything except for the educational specialization will be on hold until January 2026. So those levels of 1-4 are still in discussion and may change. So we are as a board revisiting those things.

>> Hello. I'm Brenda. I am an education interpreter, and my question to the board is, I know you've already decided that there's not a degree required, so at the time that I am engaging RID or -- both of those require a degree as far as a qualified interpreter goes. So I'm trying to figure out how we are saying that we're presenting this licensure under circumstances of qualification but a degree is not in the picture on this side but it's in the picture on the other side. So those other certification points that we have to have our education, so as far as this goes, I'm not trying to be in trouble after the fact for if we know that we're supposed to have that degree under those regulations and then the board says that we're not supposed to have it and we're being put into a situation, you know, that I'm just not sure how we reconcile all these things. I'm just not sure how to reconcile.

LESLIE PUZIO: So I believe the recommendation is that they have a degree. However, it's not a requirement. To take the EIPA test, there's no degree requirement. There's no educational certification under RID.

Now, they used to have a certificate. RID offered, what was it called, the Ed:K-12. Now, you obtained that certificate by actually taking the EIPA and scoring a 4.0 or above. And that is sunsetted and no longer offered by RID. So maybe the educational practice papers recommends it, but however, there is no requirement of a degree in order to take the test.

>> Thank you. Appreciate it.

>> Hello, everyone. My name is Tom. I'm a Deaf individual and I do rely on interpreters on a daily basis, every day, regardless of the setting. I know some of the interpreters here in the room. Many of you I know.

I've already read through some of the regulations and what is on the board here on this PowerPoint and I really don't like a lot of what I'm seeing.

My concern is the law has some strict requirements set on the interpreters, and the interpreters end up walking on eggshells as a result to go and interpret in a specific setting, fearing they will be filed a grievance against them. Where are their skills going to go if they are not confident and able to go to work and able to collaborate directly with Deaf people?

Oftentimes I go to a meeting and the interpreters are great. Some could improve. But I don't feel there's a need for me to go and communicate to the agency and tell them that they need more training and this and that. The interpreting agency is responsible for that sort of thing. Not the board. The law, we understand that there's need for certification. But for us to take action against an interpreter for that? I don't think that's our responsibility. The agency should be looking at ODHH and with the higher ups and people following the process and the oversight.

So my question is, for myself, if I see an interpreter that I may think is a lousy interpreter, do I report that to ODHH? Or should I go to the interpreter directly? Who is responsible for that interpreter as a result after I've filed a grievance process? ODHH or the agency? Are they still going to be working or is their license revoked or suspended? I don't feel it's very fair. If the agency thinks this interpreter is pretty good and someone says they're lousy, I don't know if that's appropriate. I care about the interpreters I work with and use daily and I understand the need for licensure, I think that's important, but I think this is a process we need to revisit and clean up. That's really all I'm asking. Thank you.

JACOB LEFFLER: Just to clarify for everyone, the board's responsibility is to implement the regulations regarding what the licensure should be holding. We are following the legislation that's already been passed, the law passed in 2023. The board is responsible for implementation and enforcement. It has already been passed.

So those regulations will be holding the interpreters and the community at large accountable. And so that is one reason that we did input that agency and businesses discussion, to ensure they are also meeting those requirements, because if they are not, they can't provide interpreting services. So for any grievance processes that you want to direct about an interpreter, those would be passed over to the agency who then would give it to ODHH to determine whether that is a true grievance or not.

So would the license be revoked of the individual or the agency?

LESLIE PUZIO: Thank you for the question, Tom. We're saying both because both are accountable. Now, originally, and I believe, where is Kelby, there he is. 13-14 years ago where a motion was submitted by MDAD for consumer protection act. We all know why that was mentioned specifically and the rationale why the law is so important.

Unfortunately there are so many agencies and interpreters in the state of Maryland not operating professionally and operating unqualified. And that is both the agency

operations saying they're providing qualified interpreters when they are not, as well as interpreters presenting themselves as qualified interpreters when they are not. And it's a catch-22. Basically meaning how do we allow interpreters to represent themselves as professionals, obviously you all are here, acting as professionals, and if an interpreter is afraid they are not operating professionally, they might not be there because they might be scared of losing work.

Now, for example, if I think an interpreter is fine, I recognize that as a Deaf consumer, another Deaf consumer may have a different perspective and file a grievance. That is why the compliance officer will do an investigation and present those findings to the board, who will ultimately make a decision.

When the CO reaches out to the interpreter for clarification about the grievance, the interpreter has a right to due process, they will submit information about their work with different consumers, their references, their certification. It's not going to be immediately punitive. We will be transparent throughout the process. That's why the board will be actively involved in the decision making, because we are not fully in control. We work in the community. We receive services in the community. We have friends. We have colleagues throughout the community. It's not our place to be investigating and making decisions. That will be the role of the CO.

So hopefully that answers your question.

JACOB LEFFLER: Just to clarify regarding the agency perspective. So for myself, MDAD, PCRID, many organizations are working together to write this bill. We all did work towards this process. There were many people involved. At the time that we were working with PCRID, one member asked why didn't we add responsibility for the agencies for accountability. Because many interpreters will say this or that and there's nothing, there's no onus on the agency to follow up or regulate. So that's why we felt there was a need to add in some agency-specific regulations to make sure they are hiring licensed interpreters and are compliant with our law.

USHERLA DeBERRY: This is Usherla. Okay. So the law was signed in May 2023 by the current Governor. That being said, it took a long time to pass this law. This did not happen overnight certainly. Interpreter licensure was a long time in the making.

Therefore, we need to look at this as something that is good for our Deaf community. It is a positive. Yes, the Governor's Office of the Deaf and Hard of Hearing is responsible to serve the Deaf and hard of hearing and deafblind constituents within the state of Maryland, and we recognize your statement and your comment.

We also have to recognize why it is so mission critical that this law come to fruition. And why we have the Governor's Office of the Deaf and Hard of Hearing and why we have the State Board of Sign Language Interpreters. It's due to the responsibility that we have to our community. The statute was written to support the board in terms of their roles and responsibilities, and also it outlines the roles and responsibilities of the Governor's Office of the Deaf and Hard of Hearing.

It also within the body of the law gives PINs, a state position, which means we bring in a Deputy Director, a compliance officer, interpreting outreach manager, and what's another one?

JACOB LEFFLER: (Pointing to Tanea).

USHERLA DeBERRY: Yes, administrative assistant. All specifically related to this law and to interpreter licensure. They will have other duties as assigned but it's really about interpreter licensure. It's a big deal. That's why four positions were designated because we recognize it's a heavy lift in order to meet that need, in order for communication to be effective.

So recognizing, again, now, suppose we didn't have those positions. We would be trying to do our best and piecemeal it with the staff we have. So the fact that we have four PIN positions speaks to the gravity of the statute.

>> I'm Bill Millios. I live in Maryland. I have kids who are qualified. They've been accepted in the state of Maryland for interpreting services. As the year goes on, my focus is, like you said, to focus on protecting the children. So the education specialty, that's how I look at that. So I noticed a few things and I might jump around. I'm sorry. But the first is the NAD certification, there's no clarity in the writing. Oh, it doesn't exist anymore. So it has been taken up by the RID. And as of right now, people say I don't have NAD certification, it's been eliminated, updated.

So I notice that the CEU requires for a half of RID CEU, so is that both a collaboration between RID, that the 4 years, 80 hours, I notice that has been reduced for educational interpreting so I just didn't understand what the drastic reduction was about, just trying to understand what the collaboration or agreement, if there's been improvement of standards.

LESLIE PUZIO: That is a fantastic question.

Okay. And first of all, thank you for your comment about RID and NAD and the fact that the NAD certification has been sunsetted. You're right. It's really not a national certification.

Anyway, so during -- and I'm going to look, I believe it was the in-person CCBC portal demonstration, myself and Jacob went and there was an opportunity for some time at the conclusion of the meeting to have a discussion with several different interpreters, stakeholders, to gather their feedback, thoughts, and opinions, with a big emphasis on the CEU requirement and the fee structure, so on and so forth.

If you looked at the recommendations before, you would notice the CEU requirement in the application was higher than they are currently. So really this is based on community feedback and recommendations from the interpreter community. We followed those recommendations.

Also that the educational degree requirement and the fact that we do not require one is part of that fee. So it might look like we're lowering the expectations, but really we're starting from nothing --

>> There are RID standards. It's not nothing. We started with the industry standards that were agreed upon at RID, as well as Deaf stakeholders and community groups. So we had that to begin with. So why the modification?

LESLIE PUZIO: Okay. Right now when I say nothing, there was no licensure or requirements for interpreters in this state. So for now we're hoping to have a trickle-down effect. We're starting with a minimum. We're hoping to increase that. Future boards might add additional expectations and requirements to raise the bar and elevate the profession certainly. But we are committed also to listening to the community's feedback and ensuring that our children are protected as well and because the board did do its due diligence about the specializations, medical, mental health, legal, performing arts, education, etc. And during that time when we were looking at the specializations, the way things were written, and again, all those specializations are being held for review and to get more input from the community from folks who actually work in those fields. Each of those specializations require CEUs. For example, if a person works in all these different settings, really it would be over the amount of CEUs required by RID. It would be around 11. So for somebody who is a freelance interpreter working in all those different settings, interpreters in all those different specializations, they would be required over what is required by RID.

>> So RID is seen as a minimum, the 4 years, 80 hours. So regarding those interpreters that have specializations under the RID certificate, general education, they would then be able to meet all of the requirements and still work, correct? And they can essentially go through like a shopping cart and pick what would work best for them.

I'm sorry, I'm just listening to a group looking to lower the standards. I think the minimum standard is listening to RID, in thinking about the children receiving those services. So I think the board should revisit those standards.

Looking at those specialties, the interpreters should be able to choose what would be a best fit for them, like with the PPO. I feel like in that situation, the 80 hours they need, the interpreter would have to receive those and if that happened, we would be thrilled. That would be fantastic to see all interpreters exceed the minimum. But we couldn't see any below that minimum within the state of Maryland. Other states, they should look to us as an example -- other states are looking at the state of Maryland. So we do need to implement that and justify every decision that we are making because other states are looking to us. For us to lower our standards, I don't think that's justifiable.

LESLIE PUZIO: I want to thank you as a parent of Deaf children and somebody who has worked in the field for the interpreting community, I appreciate that.

>> And I think everybody needs to thank the board for their work. I don't think everybody understands the work that they're doing, so I want to commend the board and extend gratitude for all the work they have done as well.

>> Hello, everyone. I am Amy. This is my sign name. Nice to meet everybody who is here with us tonight. Hello, nice to see our board.

I have a few questions, but I'm going to need my glasses, so bear with me.

I would just like to get some clarification about the general licensure versus the education specialty. So if we have an interpreter with a general license, they can work in education or they need a specialized license as well?

JACOB LEFFLER: They would need both.

>> Okay. I just want to clarify that for everybody.

JACOB LEFFLER: If a person has a general license, that's fine. If they would like to work in the educational setting, they would have to have the educational specialty. If a person doesn't have any license, but they would like to specialize in education, they could just pursue that specialty.

>> I thought that's how it was defined but I wanted to get some clarification.

Okay. Ethan, this question is directed for you. Previously you said the General Assembly currently is on hold because you said the legislation needs to be reviewed or the law or something to that effect so it doesn't go into effect right now? That was a little bit vague if you could provide clarification on that.

ETHAN SONNENSTRAHL: Sure. This is Ethan. Regarding the question that was asked, what expectations are placed on the General Assembly to meet the requirements.

So for that effective date that we had set for January 1, 2025, if it were to happen that the regulations have not been passed, this has really been a great discussion, but ideally it should not go into effect if we do not have those regulations. But of course there may be different commitments. The law, the administrators may be interpreting the law differently. Or maybe there's a different process that we're trying to follow. There's a licensure process. If the law has not gone into effect, you can reach out to your legislators to ask for a postponement or for more clarification regarding the law until the regulations are truly in effect. So if there's nothing that's been changed or nothing that has been submitted, then it is truly up to the courts to make that determination about when and how it would go into effect, with or without the regulations. So we cannot start that process until we get those regulations. Logistically, it makes sense. How will we give the licenses out without the regulations? So if you want to see the process move forward, you can reach out to them.

>> Okay. I appreciate the clarification. Just a quick follow up. So since it's not going into effect in January, then that grace period, how is that impacting the grace period? What happens with that?

JACOB LEFFLER: I would encourage you to attend the board meeting next week when we will be addressing that.

LESLIE PUZIO: And this is Leslie speaking. When you come to the board meeting, please understand the board has specific topics on the agenda that will be discussed. Nothing has been discussed, motions have been made, we want to go over next steps. I recognize there's a lot of concerns. You will see a lot of discussion and then potential outcomes at that board meeting.

JACOB LEFFLER: So the reason I encourage you all to attend or watch the board meeting next week, the reason is that we can't have any discussion that would take place outside of a board meeting. So that will be taking place on Zoom.

>> What time is that?

JACOB LEFFLER: It's December 18, next Wednesday, 6:00-8:00, via Zoom.

>> I'm Cody. So my question is about the agencies themselves. So the interpreter themselves is not required to have a license until July 1, '25, so the agency and their -- they are supposed to file their paperwork with ODHH when exactly and for the interpreter dealing with a Deaf client and they file a complaint, so I'm just wondering about the agency or can they, you know, file a complaint against the agency like they didn't do a proper evaluation for placing that interpreter? Can a complaint be filed against an agency?

JACOB LEFFLER: Just to answer your question about the grievances, the grace period is from July 1 -- right now we're in our grace period. So as far as the other question, anyone can file a complaint against an agency, yes. The grace period is July 1, 2025.

>> Hello, everyone. My name is Sura. My question is regarding the agency perspective as well as the interpreter perspective. So in our area, we do know that many people work remotely, in D.C. and in Maryland. So some Deaf employees that are working within the D.C. agency may live in Maryland. Who is expected to provide services for Deaf individuals living in Maryland. I understand you need to have a license. But if an agency will not tell us as the agency themselves or if they will not inform the interpreter where are Deaf individuals living at the time of receipt of services, what can we do?

JACOB LEFFLER: I think that's funny because we're actually in the midst of that conversation if a federal agency won't disclose the location of a Deaf employee. And do you want to speak to that, Ethan?

>> A federal agency, housed in D.C., has a Deaf employee who is working remotely and may be a resident of the state of Maryland. Now, the interpreter or the agency might not

be aware of where that Deaf consumer is coming from. It's virtual. And the federal agency is not required to disclose to the interpreting agency where that consumer lives. So how can the interpreter and the interpreter agency be compliant with the law if that federal agency does not disclose the residence of that individual?

ETHAN SONNENSTRAHL: That's really a great question. So keep in mind that this process is still very new. This is still a new law. The regulations are still pending. So many situations, we are looking how this would apply to the law. We don't have answers for that at this time so please submit that question to us and if you do have -- so we will provide some technical assistance that we can then answer your question in writing.

LESLIE PUZIO: This is Leslie. One thing that we can start, we can provide a little bit of a rough draft of the regulations and send those out to specific agencies to let them know that there will be some requirements that will be in effect. I think it's important to recognize as well that many federal agencies are, I mean, the assumption is that the federal law trumps the state legislation of how it takes place and is enforced regarding local state government. If there is no license requirement for the United States, aside from the ADA accessibility, there are certain situations -- Maryland law would then supersede any federal legislation.

>> To clarify, my question is, is not an out of the blue type of question. I understand your point. And the interpreter agency and interpreter would still need some assistance to really understand what the legal discussion is that needs to be had to a federal agency. That's a little bit scary to think about having that conversation. So how can you all support the interpreter or the agency as they interface with the federal agency. I think that would really help this discussion.

>> Hello. I'm Anne Braun, and my question is the time when the regulations are posted, 30 days will be the commentary period, and then what exactly will happen next after that? I'm just curious.

JACOB LEFFLER: When the regulations are posted, you're right, there's a 30-day general public posting period, and then it will be given over to the assembly and the board, and we will decide, you know, on adjustments or amendments and after that, it's finalized?

ETHAN SONNENSTRAHL: So this is Ethan. Just to add to that comment. After the 30-day comment period, the SBSLI will have time to then look at the regulations and there will be another 30-day period following that. So the comments that we have collected, SBSLI will determine whether the regulations are staying as they are or whether they need to be adapted before they do go into effect. And that is dependent on the comments that we receive.

>> Hi, hello, everybody. My name is Mackenzie. They/them pronouns. I am a very recent graduate from an interpreting program. I am very lucky and very blessed to have done my program.

From what I've been seeing and gathering from this licensure, I feel that there is a lack of support and/or transitional journey for interpreters who graduate from their ITPs. Because with this licensure, the requirement for your preliminary license is to pass the CASLI knowledge exam, which is valid.

However, once you graduate from your ITP, some people have taken their knowledge and some people haven't. Also, it takes months to get that information back. So during that time, can you not interpret? Of course people will have mentors and we'll be beside them during that process. But how do we encourage new interpreters in their ITPs in the state of Maryland with this licensure coming into effect? That's the first part of my question. I have a second part, if that's okay.

Second part is with the preliminary licensure. It has a 3-year portion and then you need to renew 2-year portion. My question is, to become certified, right, we have to have a BA. A BA can take 4 years. Of course we can take a program that transitions and, you know, they can accept your credit. However, that pigeonholes you into one specific major. What if you want to major in something else and you really want to specialize in a specific type of interpreting field and that can take 4 years? So what you're saying is that during the preliminary 3 years, you're still trying to get a BA and then you have to apply again to add on to your preliminary? I just need some clarification about the 3-year and the 2-year. That would be excellent. Thank you so much.

LESLIE PUZIO: Great questions. Because I think -- this is Leslie speaking again. Again, great question. I think oftentimes those are the most confusing and most misunderstood nuances of the regs.

So Maryland did research and had a lot of involvement from both FCC and CCBC, the two interpreter training programs when drafting the bill. Both require the students to take the knowledge and ethics exam prior to graduation. Now, students may not pass the first time. We're hoping that students for both programs at both colleges *W* we know they are provided support and guidance of the content of the exams so they hopefully pass it.

So those students have already taken the knowledge and ethical exam.

>> I took the knowledge but I did not pass. So what do I do?

LESLIE PUZIO: Keep going would be my advice. And I know that's not easy. I recognize that it's easy to say.

While a student is still in the program, they of course are covered because they are mentored and they can interpret in any setting outside legal because they are within a registered program.

Gallaudet also requires their student to take the knowledge and ethics exam because someone mentioned D.C. earlier. So all three Regal programs are preparing those students so that they can take it and pass within that 5-year period.

Yes, you have to pass. When you receive a passing grade on that knowledge and ethics exam, certainly we recognize that there is a gap there, and that is historically speaking a struggle and that is a struggle nationwide. We recognize that. The entire nation is figuring out in real time how to best support those interpreters.

When you get a provisional license, you again have the ability to work in medical, mental health, educational settings, if you are a part of a formal mentoring program. I know there are several official mentorship programs throughout the state of Maryland. I recommend exploring that and I'm happy to share additional resources to that effect with you.

To speak to your second question, CASLI does not -- does not require a BA degree. CASLI requires 120 credits. That is very different from a bachelor's degree. So please understand, if you've taken coursework and you've taken courses within your interpreting program, altogether you should be close to approximately 90 credits. And then your internship hours, any pro bono hours you've accumulated also count towards the alternative pathways. So yes. Absolutely. So I'm also happy to share information related to that because there's a lot of misunderstandings about the CASLI requirements, but they do not require a bachelor's degree. It requires 120 hours.

JACOB LEFFLER: I know we are on time and getting close to 8:00. We do have some people remaining with questions. Can we extend our time for that?

You will be the last question we will take tonight. Yes, you.

>> Hello. My name is Tanisha James. I have several questions. I do want to speak briefly about NAD. The certificate, I know that it is no more. But at one time, there were a process of three to five. The board did determine the regulations to remove that level 3. Because in other states regarding NAD did see that they prioritized some other state's decisions over the RID certificate. So why is it that we don't accept the level 3 for the licensure?

LESLIE PUZIO: Thanks for bringing that up. That was an error in the initial regs and we've already amended that.

>> Okay. Great. Thank you for answering.

So to clarify regarding the license that the agency does hold as opposed to the individual license, so for a sole proprietor, for example, I have not registered as an agency, essentially I am, but I'm not hiring other interpreters within my business.

JACOB LEFFLER: If you don't hire, then you don't have to register as far as an individual license. So if you decide that under the individual license, so two months later you decide you're going to start hiring, then you must get the agency license.

LESLIE PUZIO: This is Leslie speaking. I just want to provide clarity about freelance interpreters. If they're a 1099 contractual interpreter, you are not technically hired. So suppose you contract that interpreter, then you would need an agency license. You're

not hiring them because they're usually contractors. If you are placing other interpreters, you need to be licensed as an agency.

>> Talking about heritage or BIPOC interpreters. CODAs, to that respect. I understand that there is some need for some implementation -- understanding that some of the licensure fees that are being collected will be used to support those communities. So there is a disparity that exists, which is very large regarding the different communities and I think it's very nice, the language that we have and we see. But because we will be supporting all of these different specialties, all of these different people, but the gaps already exist and they're large. So the need to wait for the funding, to wait for things to be implemented and set up, it's a time crunch that we're experiencing. There's no effective process. Where can we go to lessen the gaps that we see for the work that we are trying to do?

JACOB LEFFLER: Thank you for your feedback. The board will be looking into that.

Did you have any comments?

USHERLA DeBERRY: I have a comment. This is Usherla. I do want to remind everyone about the four things that I shared earlier. The Deputy Director role, the compliance officer, the interpreting outreach manager, and the administrative assistant. Those two positions I mentioned in the middle are responsible for implementing the programs. The program will be focusing on marginalized communities that we did share about, which includes Deaf interpreters, people who are heritage signers that would like to become interpreters, or interpreters of color. Black interpreters or BIPOC, Black, indigenous, people of color. That is our responsibility.

So within that, we are talking about some of the funding that will be set aside for the licensure process for some of those individuals. If you are trying to pass the licensure process, we do have some funding that we should be able to provide to help you in that respect. So that really is something that exists within our office. That is a responsibility that we have. So we do recognize that we will be addressing those needs. And Tanea is working on some programs that are already existing that will be a part of our outreach effort. And I do see a question in the back.

>> But my question is, again, how do we truncate and lessen that gap, that disparity gap still exists. And I understand those four positions and the folks who will be hired, but the gap will continue to become worse as time goes by. So how do we decrease that gap?

USHERLA DeBERRY: ODHH will be leading that charge. We do recognize the need, but we are not yet there. And I think even the discussion we've been having tonight, just for us to have this town hall, it was hard to find interpreters that were all certified to be here for this event. What about the BIPOC interpreters in representation tonight? Where?

So we also do receive a number of awards. Where are the awards for BIPOC interpreters that are available? There is so much more towards other white community

members. But regarding the interpreters currently present, they also would like to provide support to lessen that gap that exists, and we do recognize that.

JACOB LEFFLER: Thank you.

>> Okay. Hello again. My question relates to, okay, I understand two questions. Shane again. I have a few questions. I'll be short. First, the CEUs. The RID CEUs you earn on a 4-year basis, the 8.0, so the license will be on top of that in aggregation or will we be counting the RID CEUs in relation to that? Okay. I was just making sure.

And the regulations, once they're set and passed, later on will you be able to amend them and adjust them? Okay, yes.

And I have feedback trying to encourage the ODHH to advertise more about these town halls themselves. What the board is talking about a there's a lot of people that don't know that even tonight was occurring. So please do more to spread the word about these meetings.

Okay. And I did have another question but I'll email it. Thank you very much.

>> Okay. I have a question related to the complaint process. So going through the complaint process and then complaining against the agency or otherwise the complaint will be sent to the ODHH, I understand. So how long will it take for the ODHH to go through the whole process and to go through -- how can we streamline the process, you know, with the agency and with the ODHH office for that particular complaint? For example, I'm a Deaf nurse so I have to be specific as I go through we're in medical specialties so there's a lot of nomenclature there, but let's just say that they're not doing their job properly. So I file a complaint that the ODHH does and then I'm just wondering exactly how does this work if we're, you know, those who are trying to understand the compliance of the law for the medical specialties and, you know, there's lives at stake. So I can still see the interpreter coming again even though I was dissatisfied with them in the past and I've asked them not to come so my license becomes on the line due to their inappropriate or incorrect interpretation. So I'm just trying to make sure.

JACOB LEFFLER: Ethan?

ETHAN SONNENSTRAHL: Yes, this is Ethan. Speaking to your question, it's a great question. We do have access within ODHH, the Office of Administrative Hearings. They are responsible for any of the administration processes. You are welcome to go through ODHH's process. It is a bit of an extensive process from the time to file as well as getting an actual hearing scheduled. That might be about 2 months. So during that time, the board and ODHH cannot revoke your license because you do have the right to due process. So I do understand your concerns there, that those interpreters might then still have a job even though it could be some serious incidents that have taken place. But of course they have constitutional rights that we as a board are not able to take without due process. So for any unqualified interpreters that maybe we're trying to remove their license, ODHH has the right to go through that process, but it may be a month or two before SBSLI goes through the process of suspending or revoke the

license or making sure they are going to appropriate workshops for any restorative justice needs. We do have to follow the constitutional rights already in place.

>> I understand that. But at the same time, how can you do some oversight on either side to make sure that we're advocating for both sides for this process? For an interpreter, it's happened to me in the past where an interpreter was working with me and a severe medical error took place and we had to go to court regarding the interpretation that took place. So I'm not trying to revoke their license, but my point is that the interpreter after that complaint has been filed should not be returned to the same place of work. I understand that they should not be ripping up their certification, but they should not be sent to the same place to work where the complaint took place.

ETHAN SONNENSTRAHL: I'll just speak to that. We do have a licensure process that this does affect. Whether there's some other errors that may have happened, you do have some extra rights or are able to reach out to an interpreter, maybe they caused you a loss of business or caused you harm. There are other processes in place that you're able to go through. You can go through your attorney if need be to file a suit against the hospital. There are different legal options that you can go through. If it is a truly serious situation, you can go through that process. SBSLI is not the only accountable agency for this process.

LESLIE PUZIO: This is Leslie speaking. I know this might not necessarily lead to anything. If anything were to happen like that again, something egregious, would you submit a grievance to the agency as well as to ODHH at the same time. In addition to that, you have every right to DNS that particular interpreter.

>> I have! And then I see them again and again and again.

LESLIE PUZIO: I recognize that. That's why I couched my statement by saying this might not necessarily happen.

So I would just continue to document, always document, that also justifies your grievance with ODHH if you have that documentation and history.

>> Okay. I'm just very hopeful in the future, down the road, the process can be streamlined because right now I'm noticing more and more Deaf people are going into the medical field, into the healthcare field, or other fields. Deaf people are working in professional settings. People are looking at us to be sure we can actually perform the tasks and do our job.

JACOB LEFFLER: And this is our last question for the night!

>> I'm going to speak in my native language. And I think that a lot of you, maybe a lot of you are going to feel not good about my comments. I'm finding licensure, I have no problem with. I respect that because you have a lot of licenses. You have a lot of business professionals out there that require licenses. I get it. I'm not against that. I'm all about that.

But I am, I feel like this is so complex, we have the 80 hours for RID. And I know you said it's included, but you're doing it every 2 years. Am I right? Every 2 years so now we have to do the math and figure out. Plus and some of us have done the math in terms of, okay, so we can overlap some of our RID CEUs with the state CEUs. But you're doubling the PPO. And just for those of us who have been doing it for a long time, have been in the field doing these professions, medical, and so forth, and again, I'm not talking about those folks, yeah, there are some that definitely need to be DNSed. But a piece of paper is not going to make that interpreter better, whether they have a certification or not.

So I get it. I get the whole reasoning behind it. But it's very complex and there's a lot of redundancy I'm seeing. Plus the cost. If you're saying that we're going to pay 150, that's for the first year. I don't mind the 100 every 2 years. That's okay. But for every specialty, I'm thinking, wow. What is it going to cost us once you all decide what those specialties will cost? And by that time, we're going to be well along in the licensure process. Will we have a voice? Right now I'm not really asking a question. I'm making a comment. There has got to be, like Tommy said, this has to be cleaned up. It's got to be better.

Also, just to address, I feel like it's a heavy burden on the interpreters that have to pay the heavy fees in order to support programs I honestly don't think it will be enough. You're getting 100,000 for your budget, ODH, that's the initial amount, and then you have these four people that you're supporting and they're going to be involved in a program, but CCBC has been doing a great job. They just got a grant for \$150,000. So my question is, why are we doing the same thing? Could we work with them? Collaboration rather than reinventing the wheel? That's really a comment, not a question.

JACOB LEFFLER: So first off, I do want to clarify, you are correct, the law does say that the 100,000 that you're seeing for the state for any use that we have. That's already been used because of the web portal specifically is what we set money aside for. We don't have any budget at this time.

So therefore we still do need some funding to support some of the programs that we do have within ODH.

To clarify, the RID and state CEUs, this is purely focusing on the education specialization for the license. So that would be two CEUs that you need to collect over 4 years. So within a 2-year period, you need one CEU which means you only need six more to qualify for RID.

With the other specialties, I recommend that you come see our board meeting next week to see some of the changes that we may be implementing.

>> Okay. Sorry. But it's going to be on Zoom. And my experience is that with Zoom, we don't really get a chance to ask. I know you can send your questions in 24 hours

ahead. I get it. But the last time we did that, none of my questions were answered. I know some other people, none of their questions were answered.

So it feels a little bit, okay, I get it, you have limited time, but I don't feel we have a voice. I don't feel that way.

JACOB LEFFLER: Yes, the community has the right to provide their questions within 24 hours of that meeting.

Now, during the board meeting of course there's no time for the community to comment.

Now, with the most recent board meeting, we received a lot of questions and many of those answers are on our website under the FAQs.

LESLIE PUZIO: This is Leslie speaking. Just to clarify, regardless of the board meeting whether it's in person or virtual, there is no participation from the public. It's for observation only. That is why we're hosting these town halls. That's the opportunity for the public to voice their concerns and ask their questions. And again, many of those questions are on the website. We're so lucky to have Tanea getting those documented and on the website.

In addition to that, all the questions answered during the meeting proper, they are listed on the website and you can certainly email us questions and those can also be added to the website.

That would be the best approach. Ethan, I believe you wanted to add something for clarification?

ETHAN SONNENSTRAHL: This is Ethan. I just wanted to clarify briefly regarding the board meetings that we do have. Any public boards in Maryland are required to have an open public meeting for observation for the public to see what the board is doing. So for this board, this town hall is the information collection opportunity. And then the board meeting will be the time that we have our internal discussion and vote on any changes that will be made. So we have not been able to accept comments, but all bodies in Maryland are required to have an open eye to the public. So for any agencies themselves, we have to collect those comments to be able to make those discussions in our board. So this town hall is your opportunity to ask your questions directly. The board meeting is for them to be able to do their business, but the meetings are open to the public to be able to watch those.

JACOB LEFFLER: I think that's all. We'll move on to the next slide.

Okay. In closing, I want to thank everybody again for coming to this town hall. This is really exciting to see everybody here. I understand that everybody cares about the professional development and the Deaf community and the interpreting community. And as a board, we want to work to support everybody and the interpreters. We're not here to hurt anybody and we're not here to create worse conditions. At the same time,

the board feels like the interpreting community should be account and the agencies also to the community.

So if I understand, time is out and people want more questions and there's follow up that needs to happen, so as far as future meetings that the board will have, please email us at this email.

LESLIE PUZIO: Point of clarification. This is also Leslie speak. Any individual, if you want to meet with any members of the board -- I am clarifying for the interpreters. So if you would like to meet virtually with any member of the board, you certainly can. We're happy to do that. So you can ask more questions. That's another opportunity to engage with you. Not during the board meeting, however.

JACOB LEFFLER: Since I have become Chair last October, it's been about two months now. I've had meetings with many interpreters asking different questions and Q&A sessions so I'm open to your feedback and I understand that it is important to me and the board your opinions and feedback. Those are always valued and I encourage you to contact the board if you have any more questions and further points to take up.

Also we have our website. This is where we post many of our common questions that we get from the community.

I want to thank everyone for your time and thank the ODHH and everybody for your support.

And Dave, thank you for letting us -- thank you for providing us this space here to host this event.

I hope everybody drives home safe.