

# State Board of Sign Language Interpreters

April 10, 2024

Town Hall

*Maryland School for the Deaf, Columbia*



# History

- Over 10 years in the making
- Joint efforts (see next slide)
- New governor, new GODHH director, new board, new chair, new attorney general staff, and new everything!
- Current status:
  - Finalizing regulations
  - Preparing web portal
  - Creating resources
  - Developing resources and programs for skill-building and certification

# Organizations

- Baltimore Black Deaf Advocates
- Baltimore Silent Orioles Club
- Chesapeake Bay Association of the Deaf
- DC Area Black Deaf Advocates
- Frederick Deaf Seniors
- Greater Washington Asian Deaf Association
- Howard County Association of the Deaf
- Latino Deaf/Hard of Hearing Association of the Metro DC Area
- Maryland Association of the Deaf
- Maryland Deaf Senior Citizens, Inc.
- Metro South Asian Deaf Association
- National Alliance of Black Interpreters-DC
- Potomac Chapter of RID
- Prince George's County Association of the Deaf
- Washington Society of Jewish Deaf
- And others

# Board Goals

- Implementation of the responsibilities placed upon us by the law and State of Maryland.
- Transparency on all levels.
- Establishment of standards for quality interpreting services in the state.
- Elevation of profession while also elevating the quality of life for the Deaf, DeafBlind, and Hard of Hearing community.

# Updated Timeline

**May 10, 2024:** Board votes on draft regulations.

**June 28, 2024:** Proposed regulations are printed in *Maryland Register* and open comment period begins.

**July 29, 2024:** Open comment period ends.

**September 6, 2024:** Final regulations are printed.

**September 16, 2024:** Regulations go into effect and application portal opens.

# General Regulations

- Register with GODHH.
- Hold RID, BEI, or NAD certification in community, including educational, settings.
  - Checking on older certifications
- Earn continuing education units
- Cannot work in specialized areas (“specialist”).

**DRAFT**

**Regulations for  
Specific Settings**

# Agencies/Businesses

*Definition: Entity that includes sole owner LLC, and vendors in Maryland and other states that provides interpreters in person and virtually; provides or arranges for interpreting services, including, but not limited to, government agencies, places of public accommodations, and employers.*

- Register with GODHH
  - Owner/business information
  - Types of interpreting services provided
  - Proof of legal existence
  - Proof of good standing with state
- Agree to provide licensed ASL interpreters in all situations
- SBSLI recommends that the GODHH reviews pending licensure requests on a daily basis in order to sustain the supply of interpreters needed to meet demand



# Agencies/Businesses *(continued)*

- VRI:
  - Emergency situations
  - Maryland-based interpreters who work from home in other states
  - Does not include VRS

# Education

- Hold a current, valid RID certification or pass the EIPA written assessment and score a minimum of a 4.0 on either the PSE-ASL or ASL-PSE assessment for the appropriate grade level the interpreter has been assigned to.
  - Educational interpreters who hold the required EIPA score but no national certification can only work in a K-12 (ages 0-21) setting.
- Hold a bachelor's degree from an accredited college or university, or complete an interpreter education program (associate's or bachelor's), or complete a portfolio listing training and work experience equivalent to the degree.

# Education *(continued)*

- Licensed ASL interpreters who specialize in educational settings must accumulate 20 continuing education units (20 hours) in educational interpreting and relevant topics every two years; four of these units should include Power, Privilege, and Oppression (PPO) and Deaf culture or Deaf awareness.
- Candidates who do not hold the minimum required score of 4.0 nor meet other requirements must apply for the provisional license. Candidates will then have three years to attain the required minimum score and meet educational requirements.
- Pass background check requirements.

# Health Care

- Complete 50 hours of observation of medical interpreting.
- Pass a medical interpreting knowledge test. (TBD)
- Licensed ASL interpreters who specialize in medical settings must accumulate 16 continuing education units (16 hours) in medical ASL interpreting every two years.
- Have three years of experience interpreting in general settings within the last three years.
- Have documentation of current inoculations.
- Pass background check requirements.

# Behavioral Health

- Complete 50 hours of observation in behavioral health settings.
- Have three years of experience interpreting in general settings within the last three years.
- Pass background check requirements.
- Licensed ASL interpreters who specialize in behavioral health settings are required to accumulate 16 continuing education units (16 hours) in behavioral health ASL interpreting every two years.

# Legal

- Complete 50 hours of observation of legal interpreting.
- Pass a legal interpreting knowledge test (TBD).
- Licensed ASL interpreters who specialize in legal settings are required to accumulate 16 continuing education units (16 hours) in legal ASL interpreting every two years.
- Have three years of experience interpreting in general settings within the last three years.
- Pass background check requirements.

*Currently considering a multi-tiered system replicating Colorado's model, especially for virtual interpreting in rural areas.*

# To consider

- Emergency situations
- Temporary in-state work (filming, conferences, etc.)
- Rewording of job titles to “communication support,” “paraprofessional,” etc., to circumvent regulations
- Signed languages other than ASL/English
- Seasoned interpreters with more than 25 years of documented professional interpreting experience
- Reciprocity
- Volunteer situations — must be unpaid to be exempt.

# Comments & Q&A

## Ground rules:

- Identify yourself.
- Speak one at a time.
- Use one language at a time.
- Be mindful of the interpreters working tonight.
- Adhere to the two-minute limit for your comment or question.
- Priority is given to those who emailed before the deadline.
- Any questions or comments not asked due to time constraints may be emailed to [gov.odhh@maryland.gov](mailto:gov.odhh@maryland.gov). If you have already emailed, we will respond within a week.



**When can we begin  
submitting applications?**

*September 16, 2024*

## **What will the fees be?**

*\$150 for initial application fee; annual renewal fees will be lower. Other fees will take into consideration circumstances, such as provisional and student requests.*

## **How will the fees be used?**

*Section 9-2146: Fees are directly handled by the State Comptroller office and overseen by the Director. Expenses will go to staff, mentoring, and programs.*

## **What certifications will be accepted?**

→ *BEI, RID, and NAD.*

◆ *May include older, retired certifications; checking on this.*

◆ *Must be between signed languages or spoken language to signed language (or vice versa).*

→ *EIPA score of 4.0 or higher for educational interpreters.*

## **Will you accept interpreting certifications from other countries?**

*No. However, interpreters from other countries may apply for an exemption for unique situations, and the board will determine their eligibility.*

## **What if I interpret in Maryland only for a day or two?**

*As stated in Section 9-2418, certified interpreters may apply for an exemption if they provide fewer than 80 hours of interpreting services each calendar year. They must notify the board of each assignment within 10 days of completion.*

# **What about VRS?**

*Video relay services are exempt from this law.*

## **Okay, how about VRI?**

*Video relay interpreters must register if working independently; if working through a company, the company must register as a business.*



**The Bill states that provisional interpreters must take and pass a nationally or regionally recognized knowledge and ethics exam or other exam approved by the board. It also says must also “satisfy other requirements established by the board”. What are the other requirements? Also, if an interpreter has taken, yet not passed a nationally or regionally recognized knowledge and ethics exam, does this mean they cannot work and earn an income as an interpreter starting January 2025?**

*The law is very clear that applicants must have passed a “nationally or regionally recognized knowledge and ethics exam or other exam approved by the board.” This means that if an individual has not yet passed this exam, they cannot earn income as an interpreter, even if they are waiting for results.*

*Other requirements might include hours of observations, for example. We have received input from various national organizations including RID, NAIE, Boys Town, AMPHL, and so on. It is our goal to have justification for each and every regulation we develop to offer transparency, fairness, and evidence-based information whenever possible.*

**How will schools be prevented from keeping unlicensed interpreters by changing the job title to "language facilitator," "language para," and other terms that keep the same job description, but change the title to work around the law?**

*This is definitely a major concern and has already happened in numerous states. The board is currently developing language to prevent any circumventing of the law, and will communicate with MSDE on this matter.*

**There is currently no Deaf interpreter program in Maryland that I know of. How will we promote CDIs in the future with this gap? From my understanding, Deaf interpreters would be required to be licensed as well as hearing interpreters.**

*CDIs can receive licensure with their certification. As stated in the law, GODHH will help develop resources and programs for certification preparation. The board is also examining how to not marginalize communication facilitators for DeafBlind individuals. Also Section 9-2416 discusses this.*

**For those who have worked for many years as interpreters but are not certified, will they be allowed to work while waiting for test results or taking the exam?**

*Yes. This is in Section 9-2425. The board may issue three-year provisional licenses (with two additional years if necessary) to those who have taken and passed a nationally or regionally recognized knowledge and ethics exam or another board-approved exam and satisfied other requirements. There are other exceptions as well.*

**School systems with staff interpreter positions, historically, do not pay as well as community work, which contributes to the shortage of interpreters in education. When this law goes into effect and a good chunk of interpreters cannot work because they don't qualify for licensure, the school system's budget will not attract new interpreters with the levels the licensure will require. In a time when those that work in education are continuously asked to do more with less, will the state provide funding to attract interpreters to the field of educational interpreting?**

*This was a major concern in other states such as Minnesota as well. However, the results spoke for themselves. The state went from only six certified educational interpreters to over 300 and is an example of a very successful model for educational interpreters.*

*The overarching goal here is to ensure quality among educational interpreters, and schools will need to meet this requirement, just as they do with teachers and administrators who require licensure to be employed. GODHH will definitely develop resources and programs to expand this field.*

## **How will information be disseminated about the law?**

*The act states in Section 9-2435, Number 4: “The SBSLI shall develop and implement a public awareness campaign.” The campaign is anticipated to begin this summer.*



# THANK YOU!

[www.odhh.maryland.gov](http://www.odhh.maryland.gov)

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**Maryland**

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DEAF AND HARD OF HEARING