

Regulations	Concerns/Comments
<p>.01 Purpose and Scope.</p> <p>The purpose of this chapter is to establish regulations for the licensing of individuals to provide sign language interpretation services in Maryland in accordance with State Government Article, §9-2410, et seq., Annotated Code of Maryland. This chapter does not apply to individuals providing sign language interpretation services as described in State Government Article, §9-2418(b), Annotated Code of Maryland.</p>	

Regulations	Concerns/Comments
<p>.02 Authority.</p> <p>The licensing of sign language interpreters is under the authority and supervision of the State Board of Sign Language Interpreters (SBSLI).</p>	<p>SBSLI does not have the authority over MSDE or LEAs. SBSLI does not have the knowledge, skills, or abilities to provide supervision to personnel in LEAs.</p>
	<p>SBSLI does not have oversight authority over the Maryland State Department of Education or local education agencies (LEAs). Also, SBSLI does not possess the necessary expertise, resources, or capacity to provide supervision for personnel within LEAs.</p>

Regulations	Concerns/Comments
<p>.03 Definitions.</p> <p>A. In this chapter, the following terms have the meanings indicated.</p> <p>B. Terms Defined.</p> <p>(1) "Agency" means any for-profit or non-profit entity that provides or arranges for sign language interpretation services in the State for any individual or other entity, including but not limited to:</p> <p>(a) Consumers;</p> <p>(b) Government agencies;</p> <p>(c) Places of public accommodation; and</p> <p>(d) Employers.</p>	<p>(1) "Agency" means any for-profit or non-profit entity that arranges for sign language interpretation services in the State for any individual or other entity, including but not limited to:..."</p> <p>The above definition would clearly indicate that agencies would be functioning in the role of an interpreter referral agency and arranging for the provision of services by their own staff or sub-contractors. This would then exclude those entities engaged in providing sign language interpretation services (i.e. interpreters) that do not also arrange for the service provision (i.e. do not function as an interpreter referral agency). The interpreters would then be required to obtain only a General license for interpreting and not an Agency license. This would then align correctly with the intention of Section 4, A., 1) "Provides sign language interpretation services for compensation."</p> <p>In the above definition, I recommend and request the deletion of the ninth and tenth words (i.e. "provides or") from the definition.</p> <p>As the sentence currently reads, it appears any interpreter, who could be defined as a "for-profit or non-profit entity," regardless of their federal tax treatment (e.g. Sole Proprietor, Limited Liability Corporation, S-Corp, etc.), would be required to apply as an agency, in addition to applying for an interpreter license. Those interpreters would be considered entities who "...provide... sign language interpretation services..." so they would satisfy the definition of "Agency" as defined in the proposed regulations.</p>
<p>.03 Definitions.</p> <p>A. In this chapter, the following terms have the meanings indicated.</p> <p>B. Terms Defined.</p> <p>(1) "Agency" means any for-profit or non-profit entity that provides or arranges for sign language interpretation services in the State for any individual or other entity, including but not limited to:</p> <p>(a) Consumers;</p> <p>(b) Government agencies;</p> <p>(c) Places of public accommodation; and</p> <p>(d) Employers.</p>	
<p>(8) "Office" or "GODHH" means the Governor's Office of the Deaf and Hard of Hearing.</p>	<p>(1) does not have licensed educators or licensed related service providers nor are there any subject matter experts on K12 program and educational interpreter.</p> <p>(8) does not have licensed educators or licensed related service providers nor are there any subject matter experts on K12 program and educational interpreter.</p>
<p>(11) "Restorative justice program" means a program designed to repair harm caused to all individuals involved in a crime through mediation, dialogue, or group conferencing between a licensee and an aggrieved party or complaint.</p>	<p>RJP is not ethical nor appropriate for K12 students who are minors.</p>
<p>Section 3(B)(11) states: "Restorative justice program: means a program designed to repair harm..."</p>	<p>Is the restorative justice plan appropriate for the K12 setting with students who are minors? How will the Board work with local education agencies regarding the restorative justice plan outlined in the regulations?</p>
<p>(7) "Nationally or Regionally Recognized Certification" means: (a) A sign language interpreting certification issued and recognized by one of the following: (i) The Registry of Interpreters for the Deaf (RID); or (ii) The Board of Evaluation for Interpreters (BEI). (b) Any other certification issued by a national or regional organization that is recognized by the Board.</p>	<p>Recommend, it say national, regional, or state organization in case Maryland sets up something in the future.</p>

<p>(9) Provide Sign Language Interpretation Services.</p> <p>(a) "Provide Sign Language Interpretation Services" means to convey the meaning of a message that is expressed in:</p> <p>(i) An oral or signed language by rendering the message in American Sign Language; or</p> <p>(ii) American Sign Language by rendering the message in an oral or signed language.</p> <p>(b) "Provide Sign Language Interpretation Services" includes providing sign language interpretation services in a video remote interpreting setting.</p>	<p>While this attempts to define ASL–English interpreting, it lacks clarity in key areas and omits essential modalities:</p> <ol style="list-style-type: none"> 1. Interpretation Is a Meaning-Based, Cross-Linguistic Process: Sign language interpretation involves transferring meaning between two distinct, fully developed languages, such as English and American Sign Language (ASL). This complex process requires mastery of both languages' grammar, syntax, pragmatics, and cultural frameworks. The current definition oversimplifies this process and fails to reflect the linguistic rigor involved. 2. Transliteration Is a Separate and Common Practice: Transliteration, such as Signed Exact English (SEE), Signed English, and Conceptually Accurate Signed English (CASE), preserves English word order and grammar in a signed format. These manually coded systems are not languages themselves, yet they are widely used and distinct from interpretation. Importantly, no national certification currently exists for transliteration-only practitioners. 3. DeafBlind Communication Modalities Are Excluded: DeafBlind community members commonly use tactile signing and ProTactile communication, yet these modalities are entirely absent from the current definition. Neither RID nor other national bodies offer certification for these essential modes of access, leaving many DeafBlind consumers underserved and unprotected by regulation. 4. Certification Alone Cannot Ensure Modality Competency: By conflating interpretation with transliteration and omitting DeafBlind modalities, the current definition not only marginalizes users of these systems but assumes all certified interpreters are qualified across all settings and modalities—an assumption that is both inaccurate and potentially harmful to consumers. <ol style="list-style-type: none"> 1. Clearly distinguish interpretation (cross-language, meaning-based) from transliteration (signed systems preserving English structure). 2. Explicitly include DeafBlind modalities such as tactile signing and ProTactile within the licensure scope. 3. Establish state-administered competency pathways for interpreting, transliterating, and tactile modalities not covered by national certifiers.
	<p>But there are many Deaf people whose first language is English who communicate by using an English version of sign language. They might not understand a "message rendered in American Sign Language". There are DeafBlind people who need a Pro-Tactile interpreter not just an American Sign Language interpreter. The definition of Providing Sign Language Interpretation Services needs to be expanded to reflect the population of Deaf, DeafBlind and Hard of Hearing people who live in Maryland.</p>
<p>B. Terms Defined.</p> <p>(9) Provide Sign Language Interpretation Services.</p> <p>(a) "Provide Sign Language Interpretation Services" means to convey the meaning of a message that is expressed in:</p> <p>(i) An oral or signed language by rendering the message in American Sign Language; or</p> <p>(ii) American Sign Language by rendering the message in an oral or signed language.</p>	<p>I would like to comment on section .03 Definitions of 14.41.01, in item .03 (B) (9) (a) (i) and (ii), it says American Sign Language:</p> <p>But there are many Deaf people whose first language is English who communicate by using an English version of sign language. They might not understand a "message rendered in American Sign Language". There are DeafBlind people who need a Pro-Tactile interpreter not just an American Sign Language interpreter. The definition of Providing Sign Language Interpretation Services needs to be expanded to reflect the population of Deaf, DeafBlind and Hard of Hearing people who live in Maryland.</p>
<p>(13) Video Remote Interpreting (VRI).</p> <p>(a) "Video Remote Interpreting (VRI)" means providing sign language interpretation services by videoconferencing in which the participants are in one location and the interpreter is in a separate location.</p> <p>(b) Video Remote Interpreting is also known as Virtual Interpreting, where any party that is utilizing sign language interpreting services is remote.</p> <p>(c) "Video Remote Interpreting (VRI)" does not include Video Relay Service.</p>	<p>2. Video Remote Interpreters (VRI): We ask that nationally certified out-of-state interpreters be allowed to provide VRI services in Maryland without needing a separate state license. These regulations do not include a licensure waiver or exception for VRI providers located in other states. In light of the ongoing sign-language interpreter shortage, VRI providers are critical to ensuring access to interpreting services for deaf and hard-of-hearing individuals. Requiring verification of a VRI provider's licensure in Maryland is overly burdensome and may limit access to interpreting and health services, particularly since many VRI providers are located out of state. Additionally, these regulations limit services offered by non-licensed out-of-state interpreters to only 80 hours per year, with burdensome 10-day post-assignment notification requirements. Placing these restrictions on these out-of-state non-licensed VRI providers effectively reduces the workforce further and limits access.</p> <p>We recommend that the Board revise these regulations to require that virtual remote interpreters only be certified. Additionally, while the Maryland Sign Language Interpreters Act provided for a waiver process for those licensed in other states, the current regulations do not include this provision. The cost and time involved in getting relicensed in another state may prove to be a significant barrier for interpreters.</p>

	<p>1. Under the current definition of "agency" hospitals, public schools, and other entities that have staff interpreters could be considered an agency.</p> <p>a. Per previous public forums this is not the intent.</p> <p>b. Some alternative language that may be considered</p> <p>i. "Agency" means any for-profit or non-profit entity whose primary function is to provide or arrange for sign language interpretation services in the State either through staff or contract workers.</p>
	<p>The definitions section does not clearly delineate the roles or processes for specialty licenses, nor does it define terms like "qualified interpreter" in alignment with federal guidance. This lack of clarity may lead to confusion about who qualifies, especially in nontraditional or rural settings. Specialty license criteria should be spelled out clearly, with associated costs and processes identified to avoid unintentional violations.</p>
<p>(2) "American Sign Language (ASL)" means a distinct language specific to the United States and parts of Canada that is a visual-spatial method of communication involving the hands, arms, facial markers, and body movements to communicate with others, including through the conveyance of thoughts, words, emotions, and grammatical information.</p>	
<p>(3) "Board" or "SBSL" means the State Board of Sign Language Interpreters.</p>	
<p>(4) "Continuing education unit" (CEU) means continuing education/ professional development required to obtain or renew a license issued under these regulations.</p> <p>(a) One continuing education unit equals ten hours of continuing education.</p> <p>(b) Continuing education units taken to maintain national or regional certification will be accepted.</p>	
<p>(5) "Educational programs or services by a public, state-funded, or nonpublic school means any setting birth through secondary education"</p>	
<p>(10) "Provisional License" means a limited license issued by the Board to provide sign language interpretation services in limited settings for a limited period of time in accordance with these regulations.</p>	
<p>(12) "Video Relay Service (VRS)" means the federally reimbursed and regulated program established to enable phone calls between users of American Sign Language and individuals who do not use American Sign Language by videoconferencing technology and the use of the services of a remotely located sign language interpreter.</p>	
<p>(1) "Agency" means any for-profit or non-profit entity that provides or arranges for sign language interpretation services in the State for any individual or other entity, including but not limited to:</p> <p>(a) Consumers;</p> <p>(b) Government agencies;</p> <p>(c) Places of public accommodation; and</p> <p>(d) Employers.</p>	<p>Recommendation 1:</p> <p>"...B. Terms Defined.</p> <p>(1) "Agency" means any for-profit or non-profit entity that provides or arranges for sign language interpretation services in the State for any individual or other entity, including but not limited to:..."</p> <p>In the above definition, I recommend and request the deletion of the ninth and tenth words (i.e. "provides or") from the definition.</p> <p>As the sentence currently reads, it appears any interpreter, who could be defined as a "for-profit or non-profit entity," regardless of their federal tax treatment (e.g. Sole Proprietor, Limited Liability Corporation, S-Corp, etc.), would be required to apply as an agency, in addition to applying for an interpreter license. Those interpreters would be considered entities who "...provide... sign language interpretation services..." so they would satisfy the definition of "Agency" as defined in the proposed regulations.</p> <p>The proposed definition would be as follows:</p> <p>(1) "Agency" means any for-profit or non-profit entity that arranges for sign language interpretation services in the State for any individual or other entity, including but not limited to:..."</p> <p>The above definition would clearly indicate that agencies would be functioning in the role of an interpreter referral agency and arranging for the provision of services by their own staff or sub-contractors. This would then exclude those entities engaged in providing sign language interpretation services (i.e. interpreters) that do not also arrange for the service provision (i.e. do not function as an interpreter referral agency). The interpreters would then be required to obtain only a General license for interpreting and not an Agency license. This would then align correctly with the intention of Section 4, A., 1) "Provides sign language interpretation services for compensation."</p>

(6) "License" means a license issued under these regulations to allow an individual or agency to provide sign language interpretation services.

Recommendation 2:
(6) "License" means a license issued under these regulations to allow an individual or agency to provide sign language interpretation services.

For the above definition I recommend the following change (changes are italicised and underlined):
(6) "License" Means a license issued under these regulations to allow an individual to provide, or an agency to arrange for the provision of, sign language interpretation services.

The new definition clearly distinguishes the roles of the licensed agencies versus licensed interpreters.

Regulations	Concerns/Comments
<p>.04 License Required.</p> <p>A. General. An individual shall be licensed by the Board before an individual may:</p> <p>(1) Provide sign language interpretation services for compensation; or</p> <p>(2) Represent to the public, by description of services or use of a title or designation, that the individual is authorized to provide sign language interpretation services.</p>	<p>I recommend and request the current "Section 4 License Required" be renamed to "Section 4 Licenses." The subsequent subsections would then need to be renamed to A. General License and B. Specialty Area License.</p> <p>I also recommend and request subsections C. Provisional License and D. Agency License be inserted to the new "Section 4 Licenses" with other subsequent subsections being appropriately changed in their order (e.g. subsection "C. Authorization" would become subsection "E. Authorization," and so on). Both of the new subsections would require the additional information of scope and representation be added to comport with the current Section structure and hierarchy.</p> <p>Currently, Agency Licenses are only mentioned in Definition (6) "License," and in no other section of the proposed regulations.</p>
<p>D. Exceptions. The licensure requirements of this regulation do not apply to the following:</p> <p>(1) An individual who provides sign language interpretation services as part of a video relay service;</p> <p>(2) An individual who provides sign language interpretation services as an uncompensated volunteer and in a setting in which a sign language interpreter is not otherwise required by law;</p> <p>(3) An individual described in State Government Article, §9-2418(b)(3), Annotated Code of Maryland, who does not provide sign language interpretation services in the State for more than 80 hours each calendar year, if the individual:</p> <p>(a) Self-certifies eligibility for this exemption; and</p> <p>(b) Notifies the Board of each sign language interpreting assignment within 10 days after completing the assignment; and</p> <p>(4) Any other individual identified in State Government Article, §9-2418(b), Annotated Code of Maryland.</p>	<p>Need to add "staff educational interpreters (aka classroom interpreters)" to the list.</p>
	<p>In the spirit of providing a higher standard of service to the Deaf community, I am greatly concerned that one of the licensure exceptions creates a loophole that runs counter to the law's objective. PLEASE CONSIDER REMOVING THE LICENSE EXCEPTION for an interpreter who does not provide sign language interpretation services in the State for more than 80 hours each calendar year [.04 License Required, Exception 3(a,b,c)]</p> <p>There is absolutely no way for this to be truly enforced. It will be on the honor system and in a field rife with ethical decisions, the unscrupulous will simply not report hours. For example, an interpreter can work for multiple agencies, 80 hours for each agency, and far exceed the maximum allowable hours. Who tracks the hours? How would they be registered so that all parties know how many hours a non-licensed interpreter has worked in the state? This loophole must be closed, and this means an all-or-nothing approach: No license, no work.</p> <p>This exception also creates the unintended consequence of an out-of-state interpreter, who is not licensed in Maryland and therefore perhaps not certified, being able to provide services in Maryland. The out-of-state interpreters will be even harder to track if there is no formal, central processing system. This means an unlicensed, perhaps uncertified, interpreter will be providing services over a Maryland-based interpreter who is following the rules and has already worked the maximum hours allowed. This is unjust to the Deaf consumer, and it is unfair to the Maryland-based interpreter.</p> <p>At this time, there is not a feasible method to track the hours an unlicensed interpreter works, and we cannot rely on agencies to be able to count hours worked by each unlicensed interpreter, nor can we rely on the interpreter to self-report. Absent a formal tracking system, this exception makes way for a segment of the profession we are trying to standardize for the sake of the Deaf community to be unmonitored, and therefore "do their own thing." This loophole must be closed if we want to improve the state's interpreting standards in a cohesive manner.</p> <p>Thank you for your time and consideration.</p>

B. Specialty Areas. An individual shall be licensed by the Board in a specialty area and level, if applicable, before an individual may:

(1) Provide sign language interpretation services for compensation in that specialty area as authorized based on the level, if applicable; and

(2) Represent to the public, by description of services or use of a title, designation, or level, that the individual is authorized to provide sign language interpretation services in any specialty area and level, if applicable.

Specialty areas:

The regulations do not clearly identify what is currently a specialty area and what is not. If you are going to identify a specialty area, I would think the regulations need to name it. Then, the regulations need to identify what credentials/ qualifications are needed to document an individual's eligibility to work in the specialty area.

The Board cannot regulate an individual's ability to work in a specialized area if there is no way to prove the presence or absence of specialized skills.

In addition, the Board needs to consider whether identifying a specialty area will result in limiting access to services due to the availability of interpreters who hold the credential.

Legal – SC:L.

If the Board will recognize Legal settings as a specialty area, then the Board needs to both identify what is and is not a legal setting. Then the Board needs to identify what qualifies an interpreter as competent to work in legal settings.

What criteria is the Board using to identify a legal setting? Many settings are quasi-legal. What standard should licensees use to make a determination that an offered assignment is a legal setting?

Examples of settings that are often overlooked that may require a legally qualified interpreter

- Discussions with a school resource officer
- DHS investigations
- IEP meetings
- Medical/ mental health appointment where abuse or other issues are disclosed and authorities may be contacted.

Of the 498 RID certified interpreters identified by RID as living in Maryland, 22 hold the SC:L certificate for legal interpreting.

-Not all 22 of those interpreters are available on a full-time basis to work in legal settings.

If the Board identifies Legal interpreting as a specialty area, will this limit access to legal settings for the people of Maryland due to the lack of qualified legal interpreters?

How will you qualify new interpreters to work in legal settings now that there is no longer an SC:L

Deaf interpreters did not have easy access to the SC:L and therefore there are very few with that credential. How will you License Deaf interpreters qualified to work in the legal system?

Are there court interpreter qualifications for spoken language interpreters that could be used to credential ASL interpreters to work in this specialty area?

.....

Educational- EIPA

If the Regulations will recognize educational settings as a specialty area, then they need to identify how an interpreter can prove expertise in this specialty area.

The EIPA is currently the only option for interpreters to prove expertise in interpreting in educational settings.

Of the 498 certified interpreters RID identifies as living in Maryland, 18 hold an ED:K-12 certification. There are more EIPA 3.7 or higher interpreters who are not RID members, however, the fact there are only 18 RID interpreters who have the ED:K12 certification is an indication of the limited number of interpreters who are eligible to be licensed to work in an educational specialty area.

Will the EIPA test need to match the student's language preference as identified by the IEP? (ASL or PSE; elementary or secondary)

-If yes, how will this be tracked?

Creating an educational license with a requirement for a 3.7 on the EIPA performance test as a

	<p>Specialty areas. The regulations do not clearly identify what is currently a specialty area and what is not. If you are going to identify a specialty area, I would think the regulations need to name it. Then, the regulations need to identify what credentials/ qualifications are needed to document an individual's eligibility to work in the specialty area. The Board cannot regulate an individual's ability to work in a specialized area if there is no way to prove the presence or absence of specialized skills. In addition, the Board needs to consider whether identifying a specialty area will result in limiting access to services due to the availability of interpreters who hold the credential.</p> <p>Medical If the Board will develop regulations that regulate which interpreters can work in a medical setting, there needs to be a way for those interpreters to prove they are qualified to work in a medical setting. There is no ASL certification for medical interpreters. Options for medical interpreter certification include: https://www.certifiedmedicalinterpreters.org/ https://cchicertification.org/ these certificates are written tests only and do not have an ASL performance component. </p> <p>Mental Health If the Board will develop regulations that regulate which interpreters can work in a mental health setting, there needs to be a way for those interpreters to prove they are qualified to work in a mental health setting. Options for mental health ASL certification include: ASL interpreter credentialing program (referred to as 'Q') is available for mental health interpreter qualification http://www.mhit.org/qmhi.html</p> <p>Few interpreters hold and maintain this qualification Zero Q interpreters in Maryland Two Q interpreters in Virginia One in Delaware Zero in Washington, DC</p> <p>If it is determined that mental health settings are a specialized setting, how will the Board ensure the people of Maryland who rely on ASL interpreters are working with qualified mental health interpreters?</p>
	<p>I have grave concerns about the VRI portion of the regulations and urge the board to reconsider a few items as well as ADD LANGUAGE THAT CLEARLY STATES THE SCOPE OF VRI. It would be more impactful and close a loophole if the board were to clarify who is allowed to provide VRI services for Deaf consumers in the state of Maryland.</p> <p>As it stands, an out-of-state interpreter could technically provide services without being licensed under the 80-hour annual limit. However, there is no way to track the number of hours. That creates a loophole for both out-of-state and Maryland-based interpreters. I understand the spirit of the regulation, but the reality is that there is no way to monitor this and both out-of-state and Maryland-based interpreters could simply not report, or a Maryland-based interpreter would drive over a state line to say they were not in Maryland. There is no way to monitor the home states of interpreters. Who can provide VRI services in the state of Maryland?</p> <p>To avoid circumvention of the regulations, I believe it best to mandate that all interpreters providing VRI for state of Maryland requests be licensed.</p>

<p>.04 License Required.</p> <p>A. General. An individual shall be licensed by the Board before an individual may:</p> <p>(1) Provide sign language interpretation services for compensation; or</p> <p>(2) Represent to the public, by description of services or use of a title or designation, that the individual is authorized to provide sign language interpretation services.</p> <p>B. Specialty Areas. An individual shall be licensed by the Board in a specialty area and level, if applicable, before an individual may:</p> <p>(1) Provide sign language interpretation services for compensation in that specialty area as authorized based on the level, if applicable; and</p> <p>(2) Represent to the public, by description of services or use of a title, designation, or level, that the individual is authorized to provide sign language interpretation services in any specialty area and level, if applicable.</p> <p>C. Authorization.</p> <p>(1) An active license issued by the Board authorizes the licensee to provide sign language interpretation services within the scope of the general or specialty areas as indicated by the Board.</p> <p>(2) The Board authorization to provide sign language interpretation services is contingent upon the individual maintaining any nationally or regionally recognized certification required for the license.</p> <p>D. Exceptions. The licensure requirements of this regulation do not apply to the following:</p> <p>(1) An individual who provides sign language interpretation services as part of a video relay service;</p> <p>(2) An individual who provides sign language interpretation services as an uncompensated volunteer and in a setting in which a sign language interpreter is not otherwise required by law;</p> <p>(3) An individual described in State Government Article, §9-2418(b)(3), Annotated Code of Maryland, who does not provide sign language interpretation services in the State for more than 80 hours each calendar year, if the individual:</p> <p>(a) Self-certifies eligibility for this exemption; and</p> <p>(b) Notifies the Board of each sign language interpreting assignment within 10 days after completing the assignment; and</p> <p>(4) Any other individual identified in State Government Article, §9-2418(b), Annotated Code of Maryland</p>	<p>An individual who provides sign language interpretation services as an uncompensated volunteer and in a setting in which a sign language interpreter is not otherwise required by law)</p> <p>I recommend this say uncompensated volunteer OR (change “and” to “or”) or create another line to separate volunteer from in a setting in which a sign language interpreter is not otherwise required by law;</p>
<p>D. Exceptions. The licensure requirements of this regulation do not apply to the following:</p> <p>(2) An individual who provides sign language interpretation services as an uncompensated volunteer and in a setting in which a sign language interpreter is not otherwise required by law;</p>	<p>#4</p> <p>I am concerned about the specialty area licenses. Requiring specialization will decrease the number of interpreters available to serve in that capacity and will harm the deaf community by greatly shrinking the pool of interpreters, for example, to interpret a medical appointment despite being certified and having experience interpreting medical appointments. It also is requiring interpreters to have to pay additional amounts to be licensed in each specialty area.</p>
	<p>I am concerned about the exception under .04 D. 2. which states that uncompensated volunteers are exempt from licensure requirements in certain settings. Specifically, I am concerned how this will affect interpreting services in places of worship and religious gatherings. I'm afraid this will encourage churches and other institutions to seek unpaid volunteers in lieu of paying for professional services. It seems the intent of a licensure requirement is the assurance of quality service; but, this exception encourages the opposite and leaves deaf parishioners vulnerable to volunteers who tell leadership they are qualified when they may not be.</p>

	<p>Permit Reciprocity or Waiver for Out-of-State Licensed Interpreters</p> <p>The Board should reconsider its decision not to allow individuals licensed in other jurisdictions to waive the Maryland licensing requirements.⁶⁷ The legislature included this option in the law to facilitate access for Maryland residents, and the proposed rule includes no justification to support denying them access to these qualified providers. Denying reciprocity for remote interpreters may result in fewer qualified professionals being available to Maryland residents and employees.</p> <p>The Board should instead permit any individual licensed in another state to provide services in Maryland without additional burdens, while also still allowing employees of licensed employers to provide interpreting services without holding an individual license, if permitted in the state in which the employee-interpreter lives and works.</p>
--	---

	<p>I am a hearing child of deaf adults, with many other deaf family members as well. As such, I have extensive experiences with ASL interpreters over my lifetime. Most especially in the last several years, I have had to arrange for many interpreters for my elderly parents' extensive hospital stays. So, I am greatly appreciative of highly skilled interpreters, especially those who have been vetted in the medical arena. So, I am also grateful for the licensing efforts of Maryland.</p> <p>However, I have serious concerns about the proposed regulations for ASL interpreters in "14.41.01 Licensing Requirement for Sign Language Interpreters".</p> <p>First, under ".04 License Required, B Specialty Areas", there is no enumeration of what Maryland recognizes as specialty areas. Later in the document there are occasional casual mentions of medical, legal, and/or education. And while these may be intuitive, the language in this paragraph should be specific, clear and complete as what areas are considered "specialty" to eliminate potential issues and misunderstandings.</p> <p>Second, under ".04 License Required, D "Exceptions", some of these exceptions are problematic. For example, why would those who provide services through Video Relay Service be excluded? My family has used both in person and VRS interpreting. What is unique about VRS vs. in person that warrants the exclusion? And most importantly, my understanding is that prior to this proposal, ASL interpreters in a religious setting (e.g., church, synagogue, mosque, ...) had previously been excluded from certification and licensing. It is imperative to continue this exemption for several reasons.</p> <p>Religious interpreters are predominately members of the congregation who have a spiritual connection to their church/synagogue/mosque/etc.... They are not usually hired 'disinterested' interpreters. Religious interpreters are typically from the community to which they interpret so they know many of their members and they are known by many of their members. They are committed to giving their time to serve their community. However, to meet the exemption requirements, they would need to not be paid. It is quite unfair to ask them not to receive a modest stipend.</p> <p>Alternatively, to meet the exception, they would be restricted to only interpreting 80 hours or less a year, with additional burdensome administrative reporting requirements for each and every event back to the Board. With weekly church services and additional special events (e.g., holy days, baptisms, bible studies, etc...), this would be highly restrictive.</p> <p>If religious interpreters are not exempt from the proposal, the barriers to certification and licensing are great. The cost and time to obtain and maintain certification will exclude many who are serving their religious community on the side, not as a full-time job.</p> <p>And quite significantly, there is no known provider of religious interpreter instruction for certification in any faith tradition. Our family is Catholic. Interpreting the Catholic Mass, for example, requires not only fluency in ASL but also a deep understanding of Catholic theology, liturgical language, and spiritual nuance. Many interpreters who are most effective in this context may not hold formal certification but are highly skilled due to familial ASL experience and longstanding involvement in the Church. How would a non-Catholic sign for important words and concepts such as 'sacraments', 'transubstantiation', 'chrism', etc...? Certification programs are not designed to evaluate religious interpreting competency, and individuals who are otherwise excellent at interpreting liturgies may not pass exams focused on unrelated domains.</p> <p>Should this proposal pass, I foresee there will be virtually no interpreters in any houses of faith in Maryland. And the deaf members of my family and many others will be harmed by being excluded from participating in church worship, services and faith development.</p> <p>I respectfully urge you to clarify and update this proposal.</p>
	<p>4 D 2 Please change and to or to provide more options.....as an uncompensated volunteer (or) in a setting in which a sign language interpreter is not otherwise required by law</p>
	<p>There is mention of "specialty areas" of interpreting, but I could not find any specifics of what these areas are.</p>

	<p>3. Specialty Licenses: There is a lack of clarity regarding what specialty areas or licenses will be required and what the specific requirements are for each. National certifying bodies such as Registry of the Interpreters for the Deaf (RID) and Board for Evaluators of Interpreters (BEI) limit specialty areas for legal and educational settings, but there is no mention of a “medical,” “healthcare,” or “behavioral health” specialty area. There are several concerns related to the need for a medical specialty license: what qualifies as a medical specialty, and whether this subsumes all kinds of healthcare settings or not. Interpreters are likely to be providing their services across different settings and requiring them to hold specialty licenses for each could limit access to interpreting and health services.</p> <p>MHA recommends removing the requirement for specialty licenses to avoid confusion or uncertainty about compliance risks. Any specialty licensure requirements should be established only once the Board has clearly defined what the specialty areas are and aligned the requirements with national certification standards.</p>
	<p>While I fully support the Board’s intent to ensure high-quality interpreting services for the Deaf and Hard of Hearing community, the current licensing structure and timeline raise serious issues that may, in practice, restrict access to communication and essential services, rather than enhance it.</p> <p>As a graduate of Gallaudet University’s Bachelor of Arts in Interpretation program, I am a trained and qualified interpreter who is actively entering the professional field. I am dedicated to providing exceptional access and services to the Deaf community in Maryland, and I am committed to ongoing growth in my practice. However, like many new professionals, I need time, exposure, and experience in the field to reach the level required for general licensure. The current structure leaves little to no room for this developmental process and creates barriers rather than pathways for emerging interpreters to thrive and contribute meaningfully.</p> <p>1. Section .04B</p> <p>The requirement for interpreters to be licensed separately in each specialty area, even if they already hold a general license, is excessively restrictive. This framework will likely delay or prevent Deaf individuals from receiving timely interpreting services for critical appointments—particularly in legal, medical, and educational settings.</p> <p>Qualified interpreters holding general licenses (whether certified or not) are often capable of working competently across various settings. Forcing service providers to locate interpreters who are specifically licensed in a narrowly defined specialty area will only create unnecessary bottlenecks in scheduling and reduce service availability, especially in rural or underserved areas.</p>
	<p>4. COMAR 14.41.01.04B Specialty Areas</p> <p>The authorizing legislation and draft regulations contemplate a specialty license, referred to as a “specialty area,” for providing interpretation services in certain environments, including medical settings. Unfortunately, there is a lack of clarity regarding what the specialty areas are and whether there are any specific requirements for these areas. Maryland hospitals contains both medical and behavioral health settings, and our facilities cannot practically or effectively comply with these regulations without clear definitions and requirements. UMMS requests that the regulations specify the requirements for each specialty area. Additionally, we recommend making the categories broad and not distinguishing between specialty licenses and their respective requirements too restrictively. For example, interpreters licensed for a “medical” specialty should be considered eligible for any medical setting, including behavioral health and subject to the same licensure requirements.</p> <p>UMMS and its member hospitals and healthcare facilities are committed to ensuring that Marylanders have access to qualified sign language interpreters as part of our mission to deliver high-quality healthcare and build a healthier Maryland. We appreciate the opportunity to provide comment on these draft regulations and urge ODHHS and SBSLI to consider and adopt our proposed changes.”</p>

<p>G. Waivers.</p> <p>Pursuant to the discretion granted to the Board in State Government Article, §9-2420, Annotated Code of Maryland, the Board elects not to waive any requirement of State Government Article, Title 9, for an applicant who is licensed to provide sign language interpretation services in another state.</p>	<p>2. Waiver of Requirements for Applicants Licensed in Other States.</p> <p>The draft regulations do not provide a license exemption or waiver for a qualified interpreter who is licensed or otherwise authorized to provide sign language interpretation services in another jurisdiction. At least 20 states require licensure for ASL interpreters and most of these jurisdictions establish substantively equivalent qualifications, including certification by the Board for Evaluators of Interpreters (BEI), National Association of the Deaf (NAD), or Registry of the Interpreters for the Deaf (RID). The Maryland General Assembly expressly recognized the value of waiving license requirements for applicants licensed in other states by adopting State Government Article § 9-2420, which authorizes the Board to waive any licensing requirement, including the fees, for interpreters licensed in other jurisdictions.</p> <p>Likewise, there is no license exemption or waiver for out-of-state VRI providers. These interpreters are critical to ensuring that hospitals across the State can provide high-quality and time-sensitive to critically ill and injured patients. Out-of-state interpreters are essential due in part to the ongoing sign language interpreter shortage. At present, UMMS holds contracts with three entities that provide VRI services and each uses Maryland and out-of-state interpreters due to the extremely limited number of qualified interpreters in the State. Each of the out-of-state VRI interpreters is qualified to provide interpretive services, including certification by BEI, NAD, or RID. Given the high cost and administrative burden of applying for a license in another state, these agencies and interpreters may decide to no longer provide services in Maryland, rather than complete the licensing process, which would only exacerbate the current shortage. "</p>
	<p>Transparent definitions and processes are essential to ensure interpreter compliance, agency planning, and continued access for Deaf consumers across Maryland.</p> <p>.04 General Licensing Requirements</p> <p>.04(A) prohibits interpreting for compensation without a Maryland license. This inflexible requirement creates legal conflict with federal civil rights laws, including the Americans with Disabilities Act (ADA), Section 504 of the Rehabilitation Act, Section 1557 of the Affordable Care Act, and the Individuals with Disabilities Education Act (IDEA), all of which require timely and effective communication through qualified interpreters—not necessarily state-licensed ones.</p> <p>This conflict is especially clear in emergency settings: An elderly Deaf man arrives at a rural ER at 2 a.m. The only available interpreter is experienced, has worked in the area for years, but is not yet licensed under the new state law. Under these regulations, the hospital must either delay care until a licensed interpreter is found—potentially hours away—or risk state penalties for using an unlicensed provider.</p> <p>.04(A) prohibits interpreting for compensation without a Maryland license"</p>

	<p>.04(D)(3) allows up to 80 hours/year of interpreting by unlicensed individuals under certain conditions. However, .11(B)(3) penalizes providing interpreting “outside the scope of a license.” These provisions appear contradictory and need reconciliation.</p> <p>.04(G) states the Board “elects not to waive any requirement,” yet .04(D) includes exemptions. These inconsistencies reduce regulatory clarity.</p> <p>Clarify 80-Hour Exemption and Enforcement Risk The 80-hour exemption provision is unclear in purpose, scope, and implementation, especially in comparison with the disciplinary penalties outlined in .11(B)(3). This ambiguity creates real risk for interpreters and agencies acting in good faith and may deter qualified professionals from accepting urgent or short-term assignments, particularly in underserved areas.</p> <p>Consider a nonprofit agency that contracts a nationally certified interpreter for a last-minute one-day assignment in a school setting. Although the interpreter has worked in Maryland for years without complaint, she has not yet completed licensure paperwork. Under these regulations, the agency must choose between canceling the assignment and risking student access—or accepting possible disciplinary action later. I recommend clarifying that interpreting performed under .04(D)(3) will not be considered a violation under .11(B)(3), provided notification and self-certification requirements are met.</p> <p>Conflict with Federal Law (ADA, Section 504, IDEA) The regulations create a situation where public schools, hospitals, and other federally funded entities may be forced to violate federal law to comply with state licensing requirements. Key conflicts include:</p>
	<p>.04(D) provides no exemption for public schools</p> <p>This rigid threshold exceeds federal requirements and fails to account for staffing shortages, rural needs, and the individualized nature of IEP (Individualized Education Program) planning.</p> <p>Imagine a Deaf transgender person in rural Maryland who has scheduled a healthcare appointment to discuss a deeply personal issue related to gender-affirming care. This individual has requested a specific interpreter who is also transgender, whom they’ve worked with before and trust—but that interpreter is not currently licensed in Maryland due to delays in processing. Under the proposed regulations, the healthcare provider would be prohibited from using the requested interpreter, even if no licensed trans interpreter is available and even if the Deaf individual expressly consents. This scenario underscores how the regulations may violate the spirit of federal protections.</p>
	<p>How is this 80 hours a year supposed to work for those not certified? It is very vague in both the register and the SBSLI website. Will they be required to register and pay the same fees as certified interpreters? Is it billable hours or actual hours? Who and how is it monitored?</p>
	<p>My question is about the virtual interpreting hours reporting requirement. Are these interpreters who live out of state only allowed to complete 80hrs per year or month? What happens when they</p>
	<p>What are the specialties and the levels? I like that as the regulations stand, general license holders cannot interpret in schools without the specialist license- Bravo! Too many community interpreters</p>
<p>C. Authorization. (1) An active license issued by the Board authorizes the licensee to provide sign language interpretation services within the scope of the general or specialty areas as indicated by the Board. (2) The Board authorization to provide sign language interpretation services is contingent upon the individual maintaining any nationally or regionally recognized certification required for the license.</p>	
<p>E. Nontransferable. All licenses issued by the Board are non-transferable.</p>	

<p>F. Required Notification. Any licensee, within 60 days of the change, shall notify the Board in writing of any change in the following:</p> <p>(1) Any event that results in the revocation, suspension, expiration, or any other event that impacts the validity of any nationally or regionally recognized certification required for the license; or</p> <p>(2) The licensee's name, email address, or mailing address.</p>	
<p>H. Validity Period. Unless otherwise specified, any license issued by the Board is valid for 1 year from the date of issuance.</p>	<p>H. MD Educator Licensure is five years</p>
	<p>14.41.04 H: Will interpreting licenses be issued electronically on the date of receipt of the application and fee payment? If so, how will this impact interpreters who register and are issued licensure documentation before the 1/1/2026 deadline? Or will licensure "issuance" be pre-dated or post-dated to Jan. 1st of the current or next year?</p>

Regulations	Concerns/Comments
<p>General License Qualifications.</p> <p>A. To qualify for a license to provide sign language interpretation services for the general community, an individual shall have a valid nationally recognized certification from one of the following organizations at the required level, if applicable:</p> <p>(1) Board for Evaluators of Interpreters (BEI) at the basic level or higher;</p> <p>(2) National Association of the Deaf (NAD) at Level III or higher; or</p> <p>(3) Registry of the Interpreters for the Deaf (RID)..</p>	<p>In our work with various states, we've found that when licensure regulations include specific organizations and test names, these references may not remain evergreen. There is no guarantee that these organizations will exist in the future, or new organizations will not arise. Therefore, it is recommended to include flexible language such as:</p> <p>(4) or another organization approved by the Board</p> <p>to allow for future adaptability without requiring regulatory amendments under General License Qualifications</p>
	<p>I recommend and request the following changes to Sections 5-7, for consistency in the naming conventions: Section 5 "General License Qualifications" be changed to "General License Requirements."</p>
	<p>"The proposed regulations do not address nationally certified interpreters interpreting in educational settings inside or outside of the classroom. Are nationally certified interpreters, those not holding RID ED:K - 12, permitted to work in educational settings?</p> <p>Additionally, are nationally certified interpreters permitted to work in specialty settings (medical and legal) under these regulations? The regulations are silent on all of these issues. "</p>
	<p>however the BEI is not a national certification.</p> <p>In an above section, under the Definitions it mentions "Nationally or Regionally Recognized Certification" however that language is not explicitly clear in the License Qualifications."</p>
<p>.05 General License Qualifications.</p> <p>A. To qualify for a license to provide sign language interpretation services for the general community, an individual shall have a valid nationally recognized certification from one of the following organizations at the required level, if applicable:</p> <p>(1) Board for Evaluators of Interpreters (BEI) at the basic level or higher;</p> <p>(2) National Association of the Deaf (NAD) at Level III or higher; or</p> <p>(3) Registry of the Interpreters for the Deaf (RID).</p>	<p>Board for Evaluators of Interpreters (BEI)</p> <p>National Association of the Deaf (NAD)</p> <p>Registry of the Interpreters for the Deaf (RID)None of the organizations above have the reliability or validity to issue licensure to educational interpreters. RID's JTA said that as well.</p>

<p>B. Restrictions. An individual who holds a license to provide sign language services for the general community may not provide any sign language interpretation services in a specialty area unless permitted under these regulations.</p>	<p>While specialty areas have not yet been defined, this clause establishes a concerning precedent that may further restrict interpreters' ability to serve Deaf consumers in diverse settings. Given the nationwide shortage of interpreters, such restrictions may unintentionally worsen access, particularly in specialty areas where demand is already difficult to meet. Preventing interpreters with a general license from working in specialty settings before they obtain additional permission limits professional growth and exploration. Interpreters need the ability to try out settings and determine their readiness and aptitude before deciding to pursue a specialty license, which involves both cost and time. Without flexibility, the regulations may inadvertently stall the growth of qualified professionals in specialty areas.</p> <p>Suggested Revision: I recommend that the regulation be revised to allow interpreters with a general license to accept assignments in specialty areas for up to 80 hours under the supervision or partnership of a qualified team interpreter, prior to obtaining a specialty license. This approach maintains quality and oversight while providing the practical exposure necessary for informed career development and workforce sustainability.</p>
	<p>While specialty areas have not yet been defined, this clause establishes a concerning precedent that may further restrict interpreters' ability to serve Deaf consumers in diverse settings. Given the nationwide shortage of interpreters, such restrictions may unintentionally worsen access, particularly in specialty areas where demand is already difficult to meet. Preventing interpreters with a general license from working in specialty settings before they obtain additional permission limits professional growth and exploration. Interpreters need the ability to try out settings and determine their readiness and aptitude before deciding to pursue a specialty license, which involves both cost and time. Without flexibility, the regulations may inadvertently stall the growth of qualified professionals in specialty areas. I recommend that the regulation be revised to allow interpreters with a general license to accept assignments in specialty areas for up to 80 hours under the supervision or partnership of a qualified team interpreter, prior to obtaining a specialty license. This approach maintains quality and oversight while providing the practical exposure necessary for informed career development and workforce sustainability.</p>
	<p>2) NO Speciality licenses, License-not necessary (only certification),</p>
	<p>While specialty areas have not yet been defined, this clause establishes a concerning precedent that may further restrict interpreters' ability to serve Deaf consumers in diverse settings. Given the nationwide shortage of interpreters, such restrictions may unintentionally worsen access, particularly in specialty areas where demand is already difficult to meet. Preventing interpreters with a general license from working in specialty settings before they obtain additional permission limits professional growth and exploration. Interpreters need the ability to try out settings and determine their readiness and aptitude before deciding to pursue a specialty license, which involves both cost and time. Without flexibility, the regulations may inadvertently stall the growth of qualified professionals in specialty areas.</p> <p>Suggested Revision: I recommend that the regulation be revised to allow interpreters with a general license to accept assignments in specialty areas for up to 80 hours under the supervision or partnership of a qualified team interpreter, prior to obtaining a specialty license. This approach maintains quality and oversight while providing the practical exposure necessary for informed career development and workforce sustainability.</p>

	<p>I have held a National Certification (NIC) since 2008, I have an AAS degree and BS degree both in deaf related fields, and have been a professional interpreter for 20 years. I currently am an educational Interpreter in frederick county and DO NOT believe I should have to take another test (EIPA) at this point in my career to keep my job. A National Certification should mean something. I love what I do and believe that anyone with a national certification (NIC, CI, CT, etc) should be grandfathered in to be able to continue in what ever type of interpreting environment they are in without needing to take an additional test. That should include educational interpreting. Please consider this as you are continuing to make this law.</p>
	<p>If I have read the regulations correctly it seems that the RID certification that I have had for 20 years will not qualify me to apply for an educational license. IF that is the case it will require me to spend a total of \$1000 for the full process of licensing. Here is the problem that this will cause:</p> <ol style="list-style-type: none"> 1. For me: \$1000 is a substantial out lay of money for the pay received as an educational interpreter. (will not be able to do summer freelance work as I have done in the past to supplement cost because i will need a license for that also) 2. For the school system: I have worked as an interpreter for the public school in all grades including many adult events for 30 years. I am at the age that I can retire instead of going through the additional expense of testing. I am sure many are in my situation and the school system will lose a wealth of knowledge, skill, and mentoring opportunities. <p>I see many more problems, but these are two glaring issues that I think will do the opposite of what the licensing goal was – to provide quality interpreters to the school systems providing services to the deaf population. I predict that many seasoned qualified and/or RID certificated interpreters will not continue thus leaving a real hole in the system. I wonder who will be impacted the most, deaf clients or the school system? I think both. Maybe an initial grandfathering system might mitigate this major shortage of interpreters.</p>
	<p>Since regulations for specialty licenses—except the educational provisional license—are undefined, it raises a few concerns: This restriction could limit services for Deaf consumers. Does this mean interpreters with only a general license cannot work in K-12 settings? Interpreters need diverse experience to assess their readiness for specialty licenses. The lack of flexibility may hinder the growth of qualified professionals. I suggest revising the regulation to permit interpreters holding a general license to take on assignments in specialized fields for up to 80 hours, as long as they are supervised or partnered with a qualified team interpreter. This method ensures quality and oversight while offering valuable hands-on experience to support informed career growth and long-term workforce stability.</p>
	<p>While specialty areas have not yet been defined, this clause establishes a concerning precedent that may further restrict interpreters' ability to serve Deaf consumers in diverse settings.</p> <p>Given the nationwide shortage of interpreters, such restrictions may unintentionally worsen access, particularly in specialty areas where demand is already difficult to meet. Preventing interpreters with a general license from working in specialty settings before they obtain additional permission limits professional growth and exploration. Interpreters need the ability to try out settings and determine their readiness and aptitude before deciding to pursue a specialty license, which involves both cost and time. Without flexibility, the regulations may inadvertently stall the growth of qualified professionals in specialty areas. I recommend that the regulation be revised to allow interpreters with a general license to accept assignments in specialty areas for up to 80 hours per year prior to obtaining a specialty license.</p>

	<p>While educational specialization is the only one currently mentioned, it is clear that additional specializations are anticipated and will be further defined as the bill develops. With that in mind, I want to clarify that the certifications listed in the bill—NIC and BEI—are generalist certifications. Interpreters holding these credentials are already qualified to work in a variety of entry-level settings, including medical, mental health, educational, and platform environments.</p> <p>In states that license sign language interpreters without defined specializations, professionals are trusted—and held accountable—to accept work within their scope of competence and to deepen their expertise through continued education and supervised experience.</p> <p>However, Section 5(B) appears to preemptively limit general license holders from gaining experience in specialty areas. This clause could prevent interpreters from accepting assignments in fields like medical or mental health interpreting before they have the opportunity to explore those areas or pursue further training.</p> <p>This may unintentionally:</p> <ul style="list-style-type: none"> -Restrict access to interpreting services for Deaf consumers, especially in rural or underserved areas; -Deter interpreters from pursuing specialties due to added time, cost, and unclear requirements; -Exacerbate the shortage of qualified interpreters in high-need fields like medical, legal, and educational settings. <p>Interpreters need space to grow professionally. Overly restrictive policies could hinder both individual development and community access.</p> <p>Suggested Revision:</p> <p>A) Allow interpreters with a general license to accept up to 100 hours of assignments in specialty areas under the supervision or partnership of a qualified team interpreter, prior to obtaining a specialty license. This balances oversight with professional development and workforce sustainability. Or</p> <p>B) Alternatively, in lieu of further specializations beyond educational, consider permanently recognizing RID and BEI certifications as sufficient for working in a broad range of entry-level settings. This aligns with how many other states regulate sign language interpreters.</p>
	<p>I am a certified ASL interpreter who works for a local agency, both as an interpreter and in an admin setting. This restriction is particularly harmful in practice. In Maryland, there is already a well-documented shortage of certified interpreters, particularly in specialized domains such as medical, legal, mental health, and DeafBlind settings. By barring general license holders from working in these areas unless they are ""permitted"" (without clearly defined criteria for how permission is granted), this regulation could significantly reduce interpreter availability and delay or deny access to services for Deaf consumers—especially in emergencies, rural regions, and last-minute scenarios.</p> <p>Our agency often relies on highly skilled, vetted generalist interpreters with years of experience in these settings, especially when specialists are unavailable. This regulation removes that flexibility and will likely lead to unfilled assignments, delayed services, and potential violations of the Americans with Disabilities Act (ADA).</p>

I respectfully submit these formal comments on COMAR 14.48.01 (Licensing Requirements for Sign Language Interpreters) and related provisions under § 9-2418 of the Maryland State Government Code. These comments are offered in my capacity as the Language Access and Inclusion Director at Gateway Maryland, a nonprofit organization approaching its centennial in 2026 and proudly serving the community for over 35 years through the provision of sign language interpreting and language access services. I also speak from the perspective of a nationally certified interpreter and educator with over 25 years of experience in the field, and hold a doctoral degree in Urban Education Leadership with a research focus on interpreting practices, professional development, and access equity.

I commend the State of Maryland for its commitment to professionalizing interpreter services and enhancing the quality and consistency of language access across sectors. Strong regulatory frameworks can help protect both consumers and practitioners, when designed with stakeholder input, contextual awareness, and practical feasibility in mind. However, several provisions in the proposed regulations as currently written raise concerns about accessibility, equity, workforce sustainability, and regulatory redundancy. Without thoughtful adjustments, these policies may inadvertently create new barriers for Deaf, Hard of Hearing, and DeafBlind individuals in Maryland who rely on qualified interpreters across educational, medical, legal, and community settings. To support an inclusive and effective implementation of the law, I have organized my feedback into the following nine key areas of concern, each followed by practical recommendations:

1 of 9. Certification Limitations under COMAR .05 Create Barriers to Workforce Entry and Consumer Access

COMAR 14.48.01.05 currently mandates that sign language interpreters be certified by one of three national entities to qualify for licensure in Maryland:

Registry of Interpreters for the Deaf (RID): Currently the only nationally recognized certifying body still in operation. RID certification requires a bachelor's degree or limited alternative pathways, which may not be feasible for many aspiring interpreters, especially those facing financial or educational barriers.

Board for Evaluation of Interpreters (BEI): Administered in only a few states and not available in Maryland. Pursuing BEI certification involves costly travel, lodging, and testing fees that pose significant obstacles—particularly for rural residents and early-career interpreters.

National Association of the Deaf (NAD): While once a major certifying body for interpreters, NAD has not issued new interpreter certifications for over a decade and no longer offers this credentialing pathway.

As such, Maryland interpreters effectively have access to only one functional certification pathway, which can be both financially and logistically prohibitive. This narrow requirement is especially problematic at a time when Maryland faces a critical shortage of interpreters in public education, healthcare, legal services, and community programs. Limiting licensing to these few credentialing routes will only exacerbate delays in service delivery, increase costs for consumers and agencies, and strain an already overextended interpreter workforce.

Importantly, many highly qualified interpreters, especially from earlier generations or non-traditional backgrounds, developed their skills outside of formal certification routes. While current norms emphasize a bachelor's degree and RID certification, this was not always the standard. These interpreters have consistently demonstrated professional excellence and deep community trust through years of practice. We cannot afford to exclude proven interpreters simply because their path diverged from conventional models. Their value lies in their ability to ensure effective, real-world communication, especially in underserved areas where need is high.

1. Establish a Maryland-based performance evaluation or credentialing process that allows qualified interpreters to demonstrate their competency through direct assessment rather than third-party certification alone.

2. Create alternative registration pathways that honor non-traditional qualifications, such as verified mentorships, continuing education, years of experience, and documented community recommendations—especially for interpreters working in underserved or high-need areas.

3. Form an inclusive Interpreter Review Board, composed of certified interpreters, Deaf and DeafBlind

"9. Concern: Over-Reliance on RID Certification Equates Certification with Qualification, Potentially Excluding Effective Interpreters

Quality assurance must be balanced with inclusivity and real-world practicality. Maryland's proposed regulations place undue emphasis on national certification, specifically through the Registry of Interpreters for the Deaf (RID), as the primary measure of interpreter qualification. This narrow standard risks marginalizing skilled professionals who have served the community for decades but lack RID certification due to systemic, geographic, or financial barriers.

Certification Is Not the Sole Measure of Competence: Many highly capable interpreters, particularly those from earlier generations, underrepresented communities, or rural regions, entered the field before RID certification became widespread or accessible. Often gaining expertise through real-world experience, long-term mentorships, and sustained community involvement. These interpreters have demonstrated their effectiveness across a range of settings, from emergency rooms to classrooms, without ever holding a formal credential. **Limitations of RID Certification:** While RID remains a nationally recognized certifying body, its processes have been criticized for inconsistent standards, limited transparency, and exclusion of important modalities such as ProTactile, Signed English, and Cued Speech. RID certification also does not guarantee that an interpreter is a good fit for every consumer, especially in culturally or linguistically diverse situations. Narrowly defining competence through RID risks erasing these valid alternative qualifications.

Risk of Exclusion: Over-reliance on RID reinforces the false assumption that certification equals qualification. This may disqualify interpreters with decades of experience, deep community trust, or specialized skills in uncredentialed language systems. It may also discourage new interpreters from entering the field, particularly those from diverse linguistic or cultural backgrounds, if they cannot afford or access RID's costly and time-intensive certification process.

Alignment with ADA Principles: The Americans with Disabilities Act (ADA) mandates effective communication tailored to individual needs, not adherence to one-size-fits-all credentialing. Courts and federal agencies have consistently held that effectiveness, not certification, is the measure of compliance. Maryland's regulations must reflect this flexibility and honor the ADA's emphasis on accessibility over bureaucracy.

Proposed Solutions:

1. **Recognize Multiple Forms of Evaluation:** Expand the definition of interpreter qualification to include documented peer reviews, employer assessments, continuing education portfolios, and community references.
2. **Develop a Maryland-Specific Credentialing System:** Establish a state-based credential that recognizes diverse training backgrounds and accounts for modalities not covered by RID. This could offer a pathway for experienced interpreters to demonstrate competence without leaving the profession due to regulatory exclusion.
3. **Clarify Qualification Standards in Regulation:** Maryland should explicitly state that certification and licensure are important but not exclusive indicators of qualification. This flexibility will support a more inclusive, adaptable interpreter workforce that better meets the state's varied communication needs.

Conclusion

Licensing reform should not be about controlling who interprets; it should be about improving access for those who need interpreting. A balanced, equity-based system must honor skill, experience, and community alignment, not just paperwork. Let Maryland lead by creating a flexible, inclusive, and justice-driven model.

While Maryland's licensure framework aims to ensure professional standards, key provisions as drafted are overly restrictive, financially burdensome, and insufficiently responsive to linguistic and workforce realities. Urge the SBSLI to engage in meaningful collaboration with the AERL Committee and relevant experts to:

1. Expand licensure pathways and recognize and/or create in-state credentialing alternatives.
2. Clarify and broaden the definition of "Provide Sign Language Interpretation Services" to encompass

	<p>Certification Barriers: Current reliance on national certifying bodies limits workforce entry and excludes qualified interpreters without RID certification.</p> <p>Undefined Specialty Areas: Ambiguities in ""specialty areas"" complicate implementation, risking service gaps and higher costs.</p> <p>High Licensing Fees: Excessive fees burden interpreters, particularly early-career professionals and freelancers.</p> <p>Redundant Disciplinary Systems: Overlap with national systems creates inefficiencies and risks inconsistent enforcement.</p> <p>Equity and Access Gaps: The framework risks excluding interpreters from underserved communities and marginalizing DeafBlind modalities.</p> <p>Consumer Autonomy: Lack of mechanisms for consumers to waive certification requirements undermines ADA compliance.</p> <p>Key Recommendations:</p> <p>Introduce Maryland-based credentialing alternatives and broaden qualification pathways.</p> <p>Define specialty areas or remove unnecessary designations.</p> <p>Adjust licensing fees to align with other professions and reduce barriers.</p> <p>Streamline disciplinary oversight by deferring to national systems.</p> <p>Expand licensure to include underserved modalities and regions.</p> <p>i need help with this</p> <p>Which category should this belong to?</p>
--	---

	<p>Maryland's proposed interpreter licensing regulations under COMAR 14.48.01 raise several significant concerns:</p> <ul style="list-style-type: none">• Certification Barriers: Current reliance on national certifying bodies limits workforce entry and excludes qualified interpreters without RID certification.• Undefined Specialty Areas: Ambiguities in ""specialty areas"" complicate implementation, risking service gaps and higher costs.• High Licensing Fees: Excessive fees burden interpreters, particularly early-career professionals and freelancers.• Redundant Disciplinary Systems: Overlap with national systems creates inefficiencies and risks inconsistent enforcement.• Equity and Access Gaps: The framework risks excluding interpreters from underserved communities and marginalizing DeafBlind modalities.• Consumer Autonomy: Lack of mechanisms for consumers to waive certification requirements undermines ADA compliance. <p>"Key Recommendations:</p> <ul style="list-style-type: none">• Introduce Maryland-based credentialing alternatives and broaden qualification pathways.• Define specialty areas or remove unnecessary designations.• Adjust licensing fees to align with other professions and reduce barriers.• Streamline disciplinary oversight by deferring to national systems.• Expand licensure to include underserved modalities and regions."
--	--

	<p>Maryland's proposed interpreter licensing regulations under COMAR 14.48.01 raise several significant concerns:</p> <p>Certification Barriers: Current reliance on national certifying bodies limits workforce entry and excludes qualified interpreters without RID certification.</p> <p>Undefined Specialty Areas: Ambiguities in ""specialty areas"" complicate implementation, risking service gaps and higher costs.</p> <p>High Licensing Fees: Excessive fees burden interpreters, particularly early-career professionals and freelancers.</p> <p>Redundant Disciplinary Systems: Overlap with national systems creates inefficiencies and risks inconsistent enforcement.</p> <p>Equity and Access Gaps: The framework risks excluding interpreters from underserved communities and marginalizing DeafBlind modalities.</p> <p>Consumer Autonomy: Lack of mechanisms for consumers to waive certification requirements undermines ADA compliance.</p> <p>Key Recommendations:</p> <p>Introduce Maryland-based credentialing alternatives and broaden qualification pathways.</p> <p>Define specialty areas or remove unnecessary designations.</p> <p>Adjust licensing fees to align with other professions and reduce barriers.</p> <p>Streamline disciplinary oversight by deferring to national systems.</p> <p>Expand licensure to include underserved modalities and regions.</p>
--	---

	<p>Maryland's proposed interpreter licensing regulations under COMAR 14.48.01 raise several significant concerns:</p> <p>Certification Barriers: Current reliance on national certifying bodies limits workforce entry and excludes qualified interpreters without RID certification.</p> <p>Undefined Specialty Areas: Ambiguities in ""specialty areas"" complicate implementation, risking service gaps and higher costs.</p> <p>High Licensing Fees: Excessive fees burden interpreters, particularly early-career professionals and freelancers.</p> <p>Redundant Disciplinary Systems: Overlap with national systems creates inefficiencies and risks inconsistent enforcement.</p> <p>Equity and Access Gaps: The framework risks excluding interpreters from underserved communities and marginalizing DeafBlind modalities.</p> <p>Consumer Autonomy: Lack of mechanisms for consumers to waive certification requirements undermines ADA compliance.</p> <p>Key Recommendations:</p> <p>Introduce Maryland-based credentialing alternatives and broaden qualification pathways.</p> <p>Define specialty areas or remove unnecessary designations.</p> <p>Adjust licensing fees to align with other professions and reduce barriers.</p> <p>Streamline disciplinary oversight by deferring to national systems.</p> <p>Expand licensure to include underserved modalities and regions.</p>
--	---

	<p>Maryland's proposed interpreter licensing regulations under COMAR 14.48.01 raise several significant concerns:</p> <p>Certification Barriers: Current reliance on national certifying bodies limits workforce entry and excludes qualified interpreters without RID certification.</p> <p>Undefined Specialty Areas: Ambiguities in "specialty areas" complicate implementation, risking service gaps and higher costs.</p> <p>High Licensing Fees: Excessive fees burden interpreters, particularly early-career professionals and freelancers.</p> <p>Redundant Disciplinary Systems: Overlap with national systems creates inefficiencies and risks inconsistent enforcement.</p> <p>Equity and Access Gaps: The framework risks excluding interpreters from underserved communities and marginalizing DeafBlind modalities.</p> <p>Consumer Autonomy: Lack of mechanisms for consumers to waive certification requirements undermines ADA compliance.</p> <p>Key Recommendations:</p> <p>Introduce Maryland-based credentialing alternatives and broaden qualification pathways.</p> <p>Define specialty areas or remove unnecessary designations.</p> <p>Adjust licensing fees to align with other professions and reduce barriers.</p> <p>Streamline disciplinary oversight by deferring to national systems.</p> <p>Expand licensure to include underserved modalities and regions.</p>
--	---

	<p>Maryland's proposed interpreter licensing regulations under COMAR 14.48.01 raise several significant concerns:</p> <ul style="list-style-type: none">• Certification Barriers: Current reliance on national certifying bodies limits workforce entry and excludes qualified interpreters without RID certification.• Undefined Specialty Areas: Ambiguities in "specialty areas" complicate implementation, risking service gaps and higher costs.• High Licensing Fees: Excessive fees burden interpreters, particularly early-career professionals and freelancers.• Redundant Disciplinary Systems: Overlap with national systems creates inefficiencies and risks inconsistent enforcement.• Equity and Access Gaps: The framework risks excluding interpreters from underserved communities and marginalizing DeafBlind modalities.• Consumer Autonomy: Lack of mechanisms for consumers to waive certification requirements undermines ADA compliance. <p>Key Recommendations:</p> <ul style="list-style-type: none">• Introduce Maryland-based credentialing alternatives and broaden qualification pathways.• Define specialty areas or remove unnecessary designations.• Adjust licensing fees to align with other professions and reduce barriers.• Streamline disciplinary oversight by deferring to national systems.• Expand licensure to include underserved modalities and regions.
--	--

	<p>Maryland's proposed interpreter licensing regulations under COMAR 14.48.01 raise several significant concerns:</p> <p>Certification Barriers: Current reliance on national certifying bodies limits workforce entry and excludes qualified interpreters without RID certification.</p> <p>Undefined Specialty Areas: Ambiguities in "specialty areas" complicate implementation, risking service gaps and higher costs.</p> <p>High Licensing Fees: Excessive fees burden interpreters, particularly early-career professionals and freelancers.</p> <p>Redundant Disciplinary Systems: Overlap with national systems creates inefficiencies and risks inconsistent enforcement.</p> <p>Equity and Access Gaps: The framework risks excluding interpreters from underserved communities and marginalizing DeafBlind modalities.</p> <p>Consumer Autonomy: Lack of mechanisms for consumers to waive certification requirements undermines ADA compliance.</p> <p>Key Recommendations:</p> <p>Introduce Maryland-based credentialing alternatives and broaden qualification pathways.</p> <p>Define specialty areas or remove unnecessary designations.</p> <p>Adjust licensing fees to align with other professions and reduce barriers.</p> <p>Streamline disciplinary oversight by deferring to national systems.</p> <p>Expand licensure to include underserved modalities and regions.</p>
--	---

	<p>"Maryland's proposed interpreter licensing regulations under COMAR 14.48.01 raise several significant concerns:</p> <ul style="list-style-type: none"> • Certification Barriers: Current reliance on national certifying bodies limits workforce entry and excludes qualified interpreters without RID certification. • Undefined Specialty Areas: Ambiguities in "specialty areas" complicate implementation, risking service gaps and higher costs. • High Licensing Fees: Excessive fees burden interpreters, particularly early-career professionals and freelancers. • Redundant Disciplinary Systems: Overlap with national systems creates inefficiencies and risks inconsistent enforcement. • Equity and Access Gaps: The framework risks excluding interpreters from underserved communities and marginalizing DeafBlind modalities. • Consumer Autonomy: Lack of mechanisms for consumers to waive certification requirements undermines ADA compliance. <p>Key Recommendations:</p> <ul style="list-style-type: none"> • Introduce Maryland-based credentialing alternatives and broaden qualification pathways. • Define specialty areas or remove unnecessary designations. • Adjust licensing fees to align with other professions and reduce barriers. • Streamline disciplinary oversight by deferring to national systems. • Expand licensure to include underserved modalities and regions."
	<p>"Maryland's proposed interpreter licensing regulations under COMAR 14.48.01 raise several significant concerns:</p> <p>Certification Barriers: Current reliance on national certifying bodies limits workforce entry and excludes qualified interpreters without RID certification.</p> <p>Undefined Specialty Areas: Ambiguities in "specialty areas" complicate implementation, risking service gaps and higher costs.</p> <p>High Licensing Fees: Excessive fees burden interpreters, particularly early-career professionals and freelancers.</p> <p>Redundant Disciplinary Systems: Overlap with national systems creates inefficiencies and risks inconsistent enforcement.</p> <p>Equity and Access Gaps: The framework risks excluding interpreters from underserved communities and marginalizing DeafBlind modalities.</p> <p>Consumer Autonomy: Lack of mechanisms for consumers to waive certification requirements undermines ADA compliance.</p> <p>Key Recommendations:</p> <p>Introduce Maryland-based credentialing alternatives and broaden qualification pathways.</p> <p>Define specialty areas or remove unnecessary designations.</p> <p>Adjust licensing fees to align with other professions and reduce barriers.</p> <p>Streamline disciplinary oversight by deferring to national systems.</p> <p>Expand licensure to include underserved modalities and regions. "</p> <p>"</p>

	<p>Maryland's proposed interpreter licensing regulations under COMAR 14.48.01 raise several significant concerns:</p> <p>Certification Barriers: Current reliance on national certifying bodies limits workforce entry and excludes qualified interpreters without RID certification.</p> <p>Undefined Specialty Areas: Ambiguities in ""specialty areas"" complicate implementation, risking service gaps and higher costs.</p> <p>High Licensing Fees: Excessive fees burden interpreters, particularly early-career professionals and freelancers.</p> <p>Redundant Disciplinary Systems: Overlap with national systems creates inefficiencies and risks inconsistent enforcement.</p> <p>Equity and Access Gaps: The framework risks excluding interpreters from underserved communities and marginalizing DeafBlind modalities.</p> <p>Consumer Autonomy: Lack of mechanisms for consumers to waive certification requirements undermines ADA compliance.</p> <p>"Key Recommendations:</p> <p>Introduce Maryland-based credentialing alternatives and broaden qualification pathways.</p> <p>Define specialty areas or remove unnecessary designations.</p> <p>Adjust licensing fees to align with other professions and reduce barriers.</p> <p>Streamline disciplinary oversight by deferring to national systems.</p> <p>Expand licensure to include underserved modalities and regions. "</p>
--	--

	<p>Maryland's proposed interpreter licensing regulations under COMAR 14.48.01 raise several significant concerns:</p> <p>Certification Barriers: Current reliance on national certifying bodies limits workforce entry and excludes qualified interpreters without RID certification.</p> <p>Undefined Specialty Areas: Ambiguities in "specialty areas" complicate implementation, risking service gaps and higher costs.</p> <p>High Licensing Fees: Excessive fees burden interpreters, particularly early-career professionals and freelancers.</p> <p>Redundant Disciplinary Systems: Overlap with national systems creates inefficiencies and risks inconsistent enforcement.</p> <p>Equity and Access Gaps: The framework risks excluding interpreters from underserved communities and marginalizing DeafBlind modalities.</p> <p>Consumer Autonomy: Lack of mechanisms for consumers to waive certification requirements undermines ADA compliance.</p> <p>Key Recommendations:</p> <p>Introduce Maryland-based credentialing alternatives and broaden qualification pathways.</p> <p>Define specialty areas or remove unnecessary designations.</p> <p>Adjust licensing fees to align with other professions and reduce barriers.</p> <p>Streamline disciplinary oversight by deferring to national systems.</p> <p>Expand licensure to include underserved modalities and regions.</p>
	<p>Regarding Interpreting in Specialty Areas, the regulations do not appear to include religious settings as a specialty area, nor exempt them from the regulations. By not doing either, some religious organizations and their members will be forced to use certified interpreters who potentially lack substantive content knowledge of doctrines, covenants, beliefs, worship rituals, music, and/or church culture. They may also practice lifestyles and/or participate in conduct that violates the religious beliefs and/or foundational tenets of a church or other faith-based organization</p>
	<p>I have a clarifying question in regard to the Maryland Sign Language Interpreters Act that is set to start in January of 2026. In the bill it says that you need a regionally or nationally accepted certification, and in the definition of those terms it includes certifications provided by the RID, NAD, or BEI. In regards to the BEI, there are varying levels of certification; basic, advanced, and master. I was just clarifying which level of the BEI is needed to meet the requirement of this new act?</p> <p>Also from my understanding, if you work in a VRSA call center in the state of Maryland, you do not need to go through this process of obtaining the state licensure? "</p>

	<p>Clarify Requirements for Specialty Licenses</p> <p>We recommend that the Board remove the requirement for specialty licensure until the Board clearly defines the specialty areas and sets forth the requirements for each. The statute names the specialty areas, but the regulations do not, and they provide no detail regarding the criteria necessary to obtain a specialty license. It is premature to require specialty licensure for interpreting services – for example in health care settings – until those foundational details are established.</p>
	<p>If you meet the general license requirements why would interpreter's have to go for specialty license. What are the specialty license? There's already a significant lack of interpreters but to put more licenses is already a stretch as well as a huge financial burden.</p>
	<p>There is mention of "specialty areas" of interpreting, but I could not find any specifics of what these areas are.</p>
	<p>I am concerned that general license holders will not be permitted to work in the specialty area of education. The NIC ensures that the interpreter is minimally qualified to work in educational settings. It should be strictly educational interpreters that are not permitted to work in scopes available to the general license holders, rather than a specialty area being restricted from general license holders. I am concerned that this limitation will severely limit access to communication for consumers in education. In addition, obtaining the EIPA credential on top of the NIC is a financial burden to NIC interpreters who already pay substantial fees for certification maintenance. Thank you for your consideration in opening this specialty area to general license holders.</p>

Regulations	Concerns/Comments
<p>C. To qualify for a provisional license to provide sign language interpretation services for the education or school setting, the individual shall:</p> <p>(1) Be 18 years or older and;</p> <p>(2) Have a high school diploma or a certificate of high school equivalence, or courses from an accredited college or university and;</p> <p>(3) Have RID ED:K-12 or;</p> <p>(4) Pass the EIPA written exam and obtain a minimum score of 3.7 on the EIPA for either the:</p> <p>(a) PSE-ASL assessment; or</p> <p>(b) ASL-PSE assessment.</p>	<p>I have comments regarding the qualifications for provisional general licensure and renewal of the provisional educational license.</p> <p>Since there are no performance requirements for the general provisional license, I believe there should be a minimum requirement of graduation from an ITP with either an AA or BA degree. I believe this would ensure the licensee's ability to provide a level of skill that has at least been proven through an accredited academic course of study that has prepared the applicant for entry level work in the field.</p> <p>I see criteria for provisional educational interpreters but not yet for full licensure. How soon can we expect these requirements to be published?</p> <p>Also, if the educational interpreter has 3 years to work under a provisional license, surely the candidate who is serious about educational interpreting should be able to earn more than 20 CEU's in 3 years (about 6.3/year). *Research shows that there is a gap between what the hearing students receive and what the deaf students receive in a classroom through an interpreter. Continued education is vital to increase awareness and seek systemic change in the educational system pertinent to the deaf student.*</p> <p>At minimum in 3 years, 40 CEU's (about 13/year) is certainly warranted and doable for the interpreter who genuinely seeks to advance the cause of information access to the deaf student in the mainstreamed classroom. * ""Classroom Discourse: What is Conveyed through Educational Interpretation"" Elizabeth C. Langer and Peter K. Crume 29 July, 2023</p>
	<p>I recommend and request the following changes to Sections 5-7, for consistency in the naming conventions: Section 5 ""General License Qualifications"" be changed to ""General License Requirements.</p>
<p>.06 Provisional License.</p> <p>A. An individual who is unable to meet the licensure requirements of this chapter may apply for a provisional license.</p>	<p>".06 Provisional License A to H</p> <p>Do not match the guidelines as set by the National Association Interpreters in Education</p> <p>Note on H. Expiration - five years is half of the students' educational life and that is not ethical. "</p>
	<p>"We know more specialty licenses are in the works. For now the general license and the K-12 should cover every setting. However, if a community interpreter does not want to work in K-12 and does not hold the K-12 license they cannot sub in the school should an educational interpreter call out sick. Should community interpreters be forced to pay for an extra license every year that they may not even use? Let those community interpreters just self report when they sub in schools, up to 80 hours, just like unlicensed interpreters can. We request that this provision be considered for other specialty licenses as they are being developed. One of our biggest concerns is having a Deaf/blind client move to the area, no one knows, the interpreter shows up and realizes they're not licensed for the job, what do they do? Offering 80 hours to licensed interpreters seems only fair as we don't always know the full scope of the job until we show up. Some people only interpret a few graduations a year, should they have to pay for a platform license for just that? Once the specialty licenses are expanded upon it will truly add up and it will force interpreters to turn down jobs because they don't have those licenses, or pay hundreds of dollars every year, which is getting ridiculous. Being able to self-report in any setting up to 80 hours a year seems like a good compromise, it's already a provision provided for unlicensed interpreters so it makes sense to add it for licensed interpreters too. That way our interpreters don't have to pay for every license in order to make sure they're covered for any random one time job that comes up.</p> <p>"</p>
	<p>1. If an interpreter obtains a 3.7 in Elementary EIPA Performance test does the license obtained then qualify the interpreter to interpret in all k-12 school settings or will the interpreter need to pass the 3.7 in High School EIPA test to interpret in a high school setting?</p> <p>2. For a provisional license does the interpreter need to pass just the EIPA written or both the EIPA written and obtain the 3.7 on the performance test?</p>

	<p>I am choosing to comment on one particular aspect of this, which I believe has the most potential to do harm to our communities. We now have decades of evidence that countless numbers of deaf children have been irreparably harmed by language deprivation and lack of access to full participation in their education. It is a fact that there is a shortage of interpreters in K-12 setting. Both those things are true. The idea that to deal with this is to lower the standards to fill jobs is the best way to address this speaks volumes about where our profession puts its priorities. What about the ethical code that says we do no harm? At the very least, we should be advocating that hearing interpreters without adequate language and interpreting skills (which is overwhelmingly true) can only work in K-12 WITH a Deaf interpreter (CDI or competent DI). Not only will this allow the child equitable access, it will help the hearing interpreter learn how to convey concepts better. Does the state realize that there will come a time when they will be sued for damages done to deaf kids which may cost them millions of dollars? Maryland has a proportionally large Deaf population. Wouldn't it be great if we could lead the way and model a fair approach to this tragedy?</p>
	<p>For educational Interpreters provisional licensure: I know that just in PA they are struggling to have fully qualified interpreters with a 3.5 EIPA score- my concern would be that children would not have an interpreter at all if kept to the 3.7 provisional standard/ there would be a massive educational interpreter shortage- could there be a 3rd level added- i.e EIPA written passed, and only have that level be available for interpreters for 1 year? Additionally, with the testing times for the EIPA performance exam, Could interpreters test, get their results, and retest before it goes into effect?</p>
	<p>Isn't this timeline a little fast? It seems improbable that someone who has taken the EIPA will be able to work in the education setting, as the EIPA has a year long waiting period between test and results. Then, if you fail it, you have to wait another year before you can take it again.</p>
<p>B. To qualify for a provisional license to provide sign language interpretation services for the general community, the individual shall:</p> <p>(1) Be 18 years or older;</p> <p>(2) Have a high school diploma or a certificate of high school equivalence, or courses from an accredited college or university; and</p> <p>(3) Obtain a passing score on the knowledge and ethics written exam from either:</p> <p>(a) The Registry of Interpreters for the Deaf (RID); or</p> <p>(b) The Board of Evaluation for Interpreters (BEI);</p>	<p>I have concerns.</p> <p>The entry requirement of the NIC or BEI written is inconsistent with the requirement of a High School diploma or equivalent. A High School diploma or equivalent is not sufficient educational background to prepare a licensee to interpret in all settings where interpreters work.</p> <p>Provisional licensure for generalists does not require an interpreter to prove they know ASL.</p> <p>The entry level for interpreters is not equitable between generalist license and educational license requirements.</p> <p>The requirements are not aligned with the reality of obtaining the required qualifications.</p>

	<p>2. CASLI requires proof of a BA and/or the Alternative Pathway in order to take the written test. It is inconsistent with the re</p> <p>CASLI Generalist Performance Exam: NIC Educational Requirement Candidates pursuing NIC Certification must have a minimum of bachelor degree (any major) or an approved updated/2012 Alternative Pathway to Eligibility application recorded in their RID/CASLI account prior to testing for CASL Generalist Performance Exam: NIC. https://rid.org/certification/available-certifications/ Therefore the Licensure requirement of a passing score on the NIC written would require the interpreter to have a BA or satisfy the alternative pathway prior to taking the NIC written. This is not in alignment with the requirement of a High School Diploma as the educational requirement for provisional licensure. The BEI varies in the educational requirements for the written test, depending on the state you take the BEI. Missouri: B) Have completed a minimum of thirty (30) credit hours from an accredited college or university before taking the written test of English proficiency and have earned an associate degree and/or a minimum of sixty (60) credit hours from an accredited college or university before taking the performance examination. Texas: have earned an associate degree or a minimum of 60 credit hours from an accredited college or university, with a cumulative GPA of 2.0 or higher; and ILLINOIS: possess a high-school diploma or equivalent at the time you submit the application; WISCONSIN LICENSE 1. The applicant satisfies all of the following: a. The applicant has received at least an associate degree in sign language interpretation, or an equivalent degree, as determined by the department after receiving advice from the committee. Requires BEI TEP, bit does nt have a degree requirement to take the test. The BEI is not offered in Maryland, nor in any state nearby</p> <p>3. Interpreters who are granted a provisional license will be working in all settings in Maryland. This includes, but is not limited to medical and mental health appointments, schools, state and federal government, business, financial settings, really anywhere you can think of. These diverse experiences require an interpreter to have a breadth of knowledge as well as the ability to research new topics, synthesize new information, and apply it in a second language. I would think an AA degree would be a minimum qualification for individuals requesting a provisional license that would lead to them working in such wide-ranging content areas.</p> <p>4. Provisional generalist interpreters have no requirement to prove they know sign language or have any interpreting skills. Educational interpreters have to either be certified or be provisionally licensed which requires they provide evidence they possess both sign language and interpreting skills in a specialized field at a level higher than roughly 75% of their peers via a 3.7 or higher on the EIPA performance test. (https://digitalcommons.unf.edu/cgi/viewcontent.cgi?article=1108&context=joi)</p> <p>A 3.7 score on the EIPA is high for an entry level requirement. Per NAIE, 27 states require a 3.0 or 3.5 for a permanent credential (https://naiedu.org/state-standards/). Fourteen states require a 4.0 for a permanent credential. Requiring a 3.7 as an entry level criteria seems excessive. If you compare it to the lack of ASL skill assessment requirements for general provisional licensure it seems an extra burden. Suggestion- Require generalist interpreters to provide proof of ASL competency via a screening such as the ASLPI (https://gallaudet.edu/american-sign-language-proficiency-interview-aslpi/) This is not a test of interpreting skills, simply an evaluation of conversational ASL skills Reduce the entry level EIPA requirement to a 3.0 or 3.2 for interpreters working in the education specialty area This will ensure the provisional interpreter is able to interpret in educational settings with some effectiveness while they develop their skills with a goal of obtaining RID certification within the time frame allotted by the Licensure Board.</p>
	<p>1. I hope that the educational interpreter will have RID -OR- EIPA and NOT require BOTH. 2. Please keep it as simple as possible because I fear interpreters will drive to PA for basic licensing without specialties. 3. Have a task force to make sure school systems hire certified - not signing paras</p>

	<p>Concern:</p> <p>Section .05 outlines qualifications for a general license, yet it makes no mention of education as a specialty area or pathway. In contrast, educational interpreting is only addressed under the provisional license section (.06), which creates serious ambiguity. This omission may imply that interpreters working in educational settings cannot ever qualify for a full license—leaving them permanently in a provisional status.</p> <p>Additionally, the required EIPA score of 3.7 for a provisional education license seems unusually high, especially considering that in many other states with provisional license requirements, a 3.0-3.5, depending on the state, qualifies them for a provisional license; 4.0 is often considered equivalent to national certification within the education specialty. What, then, is the score threshold for full licensure in educational settings? It is not defined in the current regulation. This raises important questions:</p> <p>-Will interpreters need to retest and obtain a higher score to transition from provisional to full licensure in education? If so, what score is required?</p> <p>-How will the state address the extensive wait times (often over a year) to receive EIPA results?</p> <p>Given that the law is set to go into effect in six months, interpreters currently working in schools may not be able to meet the timeline for licensure or retesting, even if they act immediately. Without clarification or transitional provisions, this could result in skilled interpreters being excluded from their roles due to procedural delays, not lack of competence. And this, in turn, will likely lead to Deaf children going without qualified interpreters and a setting that arguably requires some of the most competent interpreters because whoever is interpreting for them is going to directly impact their access to the education.</p> <p>Suggested Revision:</p> <p>I strongly recommend that the regulations be revised to:</p> <p>A) Include educational interpreting as a valid specialty under general licensure,</p> <p>B) Define what constitutes full licensure in educational settings, and</p> <p>C) Provide flexibility or waivers to accommodate delays in EIPA testing and score reporting.</p>
	<p>I have been a teacher for 21 years. I have worked with a dozen DHH students and numerous interpreters. As the interpreter shortage persists, I have witnessed the decline of academic achievement, confidence, psychological wellness, and emotional stability of deaf students. It is tremendously difficult, and mostly impossible for teachers to communicate class materials, lectures, emergency events, and other meaningful conversations with no interpreter. This is an enormous responsibility teachers are forced to undertake. The SBSLI has placed greater faith in hearing teachers, counselors, and administrators with no sign language, or cultural understanding, than interpreters. Teachers cannot meet the social, emotional and educational demands of the students without interpreters. Requiring a test that takes 11-12 months to receive results is making students the sacrificial lambs. Certified interpreters are very rare in the educational setting. Consumer protection is not justification for interpreters leaving in the middle of the school year, and students with no access to communication for years. The boards initial three year provisional license phase is the only way to keep students with access to communication while moving forward. There can be no consumer protection if there are no consumers, because no services are being rendered.</p>
	<p>School districts may state they cannot find anyone certified. Honestly, many certified interpreters in my area go across state line to PA for teachers pay- double the salary. Also, most school staff interpreters have never even attempted any sign language screening. Their mentality - why pay money for a test when they cannot find any interpreters in MD? It's very frustrating for our Deaf children to be saddled with non-compliant, non-certified signers who think they are paras and discipline them and their classmates. Please keep it simple for RID OR EIPA requirements so we do not loose more interpreters to PA, DE, WV, VA and DC.</p>
	<p>"These tests are very different. (a) The RID test is a knowledge and ethics exam. (b) The BEI is strictly a test in English proficiency, not a test on knowledge or ethics. As you can find on the BEI site ""Test of English Proficiency. All new applicants for BEI Certification, or all certified interpreters wishing to become certified at the Basic, Advanced, or Master level for the first time, must pass the Test of English Proficiency (TEP) before being eligible to apply for any BEI performance test. The written Test of English Proficiency (TEP) for sign language interpreters is available year round upon request. ""</p> <p>The BEI written test does not meet the criteria of a knowledge or ethics test but a test in English proficiency. "</p>

	<p>Lack of Clarity Around Specialty Licenses</p> <p>Sections .06(A)(2) and .06(D) refer to “educational,” “medical,” and “other specialty” licenses but do not define these categories or provide criteria, processes, or associated costs. The regulations do not specify:</p> <p>What constitutes a specialty license</p> <p>What qualifications are required</p> <p>Whether additional testing, certification, or fees will be required</p> <p>Or how these categories will be enforced in practice</p> <p>For example, consider the case of a DeafBlind individual who relies on a trusted Deaf–hearing interpreter team: One member of the team does not yet hold Maryland licensure, although they are qualified and nationally certified. The proposed regulations could prevent this team from working together, forcing the consumer to use unfamiliar interpreters—jeopardizing access and safety.</p> <p>I respectfully recommend that the Board:</p> <p>Define all specialty license categories</p> <p>Outline clear qualification and application requirements for each</p> <p>Publish a fee schedule or projected cost range</p> <p>Commit to stakeholder input before creating new specialties under .06(A)(2)(d)</p>
	<p>Montgomery County Public Schools (MCPS) supports high and consistent standards that protect students' rights to effective communication access, in alignment with our commitment to quality, equity, and inclusion. Specifically, MCPS fully supports:</p> <ul style="list-style-type: none"> • State licensure • National certification, including educational certification. <p>Licensure</p> <p>Licensure signifies that an interpreter has met specific state-level requirements, which may include education, testing, and background checks. Licensure is a means of protecting the public by ensuring that only qualified interpreters are authorized to practice within the state.</p> <p>Certification</p> <p>MCPS supports the requirements for national certifications for educational interpreters. MCPS recognizes that K-12 educational settings require competencies in addition to those currently tested in the national certification regimen. MCPS recommends that COMAR require educational interpreters to hold Educational Interpreter Performance Assessment (EIPA) certification if and when the EIPA is designated a national certification. Currently, the EIPA is an assessment tool. It is not a certification. Work is underway to transition the EIPA into a national certification program.</p> <p>In closing, MCPS supports state licensure, and national certification, including specific certification for interpreters in K-12 settings.</p>

	<p>.06C: I am highly disappointed and deeply saddened that for educational interpreting the educational requirement is the very low bar of a high school or equivalent to a high school education. This is a travesty to the importance of the role educational interpreters have in the lives of Deaf students and in the futures of our students. It's also a mockery of educational interpreters as professionals in the educational field- they should be aligned with teacher's education, not aligned with the education of a classroom aide as these regulations have done. This is the time to do our very best for our Deaf/Hoh/DeafBlind students. We need to set the bar high with educational requirements no less than a 4year degree from a higher education university (as RID did with their ED certification) so that Deaf students can learn from those with an advanced degree- not on the same level or less than some of the students we serve! We also need to require a 4 year education for educational interpreters so that they have a chance to earn more money within the school system and we can attract more interpreters to this specialty to serve the growing number of Deaf students being mainstreamed. Why on Earth would we only require a high school diploma? This harkens back to when there weren't options or were very limited options for interpreters to earn a degree in interpreting. There are many 2 and 4 year degree opportunities in interpreting, even online. A four year degree in any field will give an interpreter the overall knowledge one needs to interpret a broad range of topics- this is why RID requires it for certification. Please demand more from interpreters and treat them as professionals, not helpers as they were treated in days gone by. Many MD school systems, as a benefit, help pay for education because, in academia, education is important! Furthermore, there is no reason an interpreter of any specialty should not have a 4year degree that is required of any professional. If the generalist license requires a 4yr degree, then a specialist license- especially one involved in the education of our children- should, at least, require the same.</p>
	<p>I am a highly qualified educator and an NIC credentialed interpreter with RID. Asking someone with my qualifications to take an educational interpreter exam is truly a waste of money and my time. Having an educational certificate or an educational interpreter educational exam should be another accepted qualification. Thank you</p>
	<p>"As the statute reads now, I am one of those experienced and highly educated interpreters who would immediately be unemployed as of January 1, 2026. I've been interpreting in the school system for 17 years and I have a teaching degree and a law degree. With the implementation of this law however, with its last minute added requirement of a minimum EIPA score, I will not be able to interpret in the public schools, even in a pre-k level classroom.</p> <p>I've already signed up to take the EIPA Performance, but am aware that it is a one year waiting period to receive the results. In response to the earlier draft of the licensure bill, I signed up for and took the CASLI Generalist Knowledge Exam and passed. The understanding was, with that exam passed, I could apply for a provisional license in Maryland and have three additional years to pass the CASLI Performance exam. I have the EIPA Written and took the EIPA Performance many years ago. These things would enable me to keep my current job.</p> <p>Now the goalposts have been moved again and I feel it is unreasonable to apply a blanket list of things to do, with no grace period, no grandfathering in, in order to interpret in the state of Maryland.</p> <p>I recommend allowing interpreters at least one additional year from the start of 2026 to test and receive their 3.7 or higher results for the EIPA Performance if that is going to remain a requirement.</p> <p>If this bill goes into law as is, Maryland schools will be without enough interpreters to cover student needs. Any county unable to procure an interpreter for a student with an IEP, will be out of compliance with federal law.</p> <p>Additionally, why not allow deaf consumers the option to request certified/licensed or provisionally licensed or non-licensed on their own accord? A deaf consumer should be allowed to opt for a non-licensed interpreter over having NO interpreter. The deaf community is aware that there are hundreds of competent interpreters who have not yet started this lengthy and relatively new licensure process.</p> <p>Thank you for reading and considering my comments."</p>

	<p>The 11th hour change to have a 3.7 on the EIPA performance for an educational provisional license has created a deeper and more profound effect for students.</p> <p>Students literally go years without an interpreter on a daily basis. This has shown to have a negative impact on them academically, emotionally, and socially. Not to mention federal law violations.</p> <p>As everyone is aware, there is an existing interpreter shortage. Requiring a passing test score on the EIPA performance that takes at minimum 365 days for results, is seriously undermining the spirit of the law. The board is assuming all educational interpreters are sub-par without allowing them the opportunity to prove otherwise.</p> <p>Certified interpreters are not very pronounced in the educational setting. However, they can work in education despite not needing any knowledge, skill or experience working with children in an educational setting to obtain a national certification.</p> <p>Using all or nothing approach vs a phase in approach will cause irreversible damage to dhh students.</p> <p>I hope the board reconsiders using either the written BEI, NIC, EIPA or combination to issue the educational provisional license. That phase in approach is in the best interest for students emotional, educational, social and mental wellbeing.</p>
--	--

Dear State Board of Sign Language Interpreters,
I am a National Board Certified social studies teacher and President of the Maryland State Education Association (MSEA). MSEA represents 75,000 educators and school employees who work in Maryland's public schools, teaching and preparing our almost 900,000 students so they can pursue their dreams.

MSEA is proud to represent educational interpreters across our state, and we want to ensure that the newly developed licensure standards governing their roles are fair, timely, and clearly communicated. While we share the Board's goal of guaranteeing qualified interpreters for all who benefit from their services, the proposed timeline and criteria are so narrow that they risk having the opposite of their intended effect. Instead of ensuring qualified interpreters can serve students successfully, the proposed regulations could prevent highly qualified, experienced educational interpreters from continuing to serve students and families. Many of those services are essential to both educational equity and compliance with federal law: the Individuals with Disabilities Act (IDEA), the Americans with Disabilities Act (ADA), and Section 504 of the Rehabilitation Act.

The proposed regulations would require that, by January 1, 2026, educational interpreters have:

- (1) Passed one of two licensure exams, only one of which is currently available,
- (2) Applied for a 3-year provisional license, which includes a \$300 fee,
- (3) Waited for the up to six-week application review period, and
- (4) Received a provisional license.

The first licensure exam option, the RID ED: K-12, was discontinued in 2016. The current certifications available within RID are the NIC (National Interpreter Certification) authorized by CASLI (Center for the Assessment of Sign Language Interpretation) and the CDI (Certified Deaf Interpreter) certification. Both certifications have lengthy processes and require more than a single passage score to obtain, and neither certification is equivalent to the RID ED: K-12 mentioned in the regulations. These regulations should be properly updated and clarified to accurately note what will be required for educators pursuing this licensure pathway.

As it currently stands, many educational interpreters will have a single pathway to secure a provisional license: they must pass the Educational Interpreter Performance Assessment (EIPA) written exam and score a 3.7 or greater on the EIPA Performance Test. However, the EIPA Performance Test currently requires nearly one full year to be scored. Given these constraints, it would be nearly impossible for any educational interpreter who does not already have the discontinued RID ED: K-12 certification or the appropriate EIPA scores to obtain a provisional license by the January 1, 2026, deadline. This effectively makes compliance with the new requirements a matter of luck and timing, rather than a fair and equitable process. Whether an interpreter can continue serving their school community should not hinge on whether they happened to meet certain criteria before those criteria were officially established.

Further, the proposed regulations do not recognize years of professional interpreting experience, nor do they recognize any non-education-specific interpreting certifications for educational interpreters. This omission risks overlooking the well-documented contributions and legitimate professional certifications of many highly qualified interpreters in Maryland schools.

We are also concerned by the lack of criteria available for a regular, non-provisional license for educational interpreters. Their provisional license would be valid for a maximum of 5 years, but the regulations provide no information on what additional requirements will follow. This uncertainty is heightened by the lack of criteria available for other specialty areas (legal, medical, etc.), especially given that educational interpreters operate in a variety of school-based settings as a function of their role.

The proposed timeline and criteria could mean that many current educational interpreters, and potential interpreter candidates, would suddenly no longer meet the qualifications to provide interpreting services in Maryland schools. That could cause significant disruption in services to deaf and hard of hearing students and families, risking mass violations of IDEA, ADA, and Section 504 for schools across Maryland.

Based on the concerns outlined above, we would urge the following changes:

- (1) Expand provisional licensure criteria for educational interpreters to recognize any of the following in lieu of an education-specific interpreter exam:
 - a. One or more years of professional experience with satisfactory evaluations in an educational setting by July 2025;
 - b. Non-education-specific interpreter certifications recognized under general license qualifications (BEI, NAD III, RID); or
 - c. Attestation from the school system in which they are employed.
- (2) In consultation with the Maryland State Department of Education, add criteria for a regular, non-provisional educational interpreter license.
- (3) Clarify that the existence of other specialty areas does not constrain any of the existing functions of educational interpreters' roles, including interactions that may contain some legal or medical content, such as

	<p>Lastly, in general, I find the wording regarding interpreting in educational (birth-21) settings a bit ambiguous. In section .06 I see here the outlined requirements to obtain a provisional education specialty license. However, I do not see elsewhere in the regulations what is required for a full education specialty license. This has caused significant confusion in the educational interpreting community about what is needed to qualify for a full education specialty license. Some are interpreting the draft regulations to mean that in order to work in education, one must fulfill the requirements of the provisional education specialty license, as no full education specialty license exists at this time. Others are interpreting the draft regulations to mean the general interpreting license qualifies one to work in the education specialty settings, and if one cannot qualify for the full general license, one must fulfill the requirements of the educational provisional license. Please provide additional clarity to the regulations; if Education is indeed a specialty area effective January 1, 2026, the expectations of requirements for full specialty licensure vs provisional specialty licensure should be worded more clearly here.</p> <p>I will close by saying thank you to the SBSLI for all the work you have done researching and drafting these regulations. I am hopeful the implementation of licensure in the state of Maryland for sign language interpreters will have a positive impact on the Deaf and Hearing consumers whom we serve alike, as well as raise the bar for the interpreting profession throughout the state.</p>
	<p>It was recently brought to my attention that the proposed regulations appear to have been edited from the original copy that was posted. Under Section 6-A-1 of the original document, it stated that general license holders were permitted to secure an educational specialty license if they satisfied the requirements of regulation 5-A of that chapter. The current copy of the proposed regulations no longer contain those statements! As the regulations are now written (as of 26 June 2025) it seems that nationally certified interpreters have no opportunity to work in educational settings at all unless they also take the EIPA and earn a score of 3.7. If that is truly the case, that is placing an additional and undue burden on certified interpreters. It seems the SBSLI prefers an assessment score over national credentials in educational settings, which is incredulous. The original language of the proposed regulations must be restored to allow nationally certified interpreters to work in educational settings without the need for an EIPA score to obtain and educational specialty license.</p> <p>In addition, I have noticed the fee schedule has also been changed. The fees have increased! For those of us who will be working to secure multiple licenses for general and specialty settings, these annual costs, in addition to annual credential and professional development costs will create an undue financial burden on many interpreters, myself included. I suggest, like most of our neighboring states, that the fee schedule run every two years. For example, in PA, ODHH collects a registration fee of \$100 every two years for a nationally certified interpreter to be eligible to work in PA. Costs for other neighboring states are much less (WV is \$25 annually to be registered). There needs to be some balance in these regulations. It seems, specifically in educational settings, that the SBSLI is willing to water down the EIPA requirements for educational interpreters working in school systems but those of us who are nationally certified are being asked to do more. Since when does an assessment score outrank and national credential? That makes no sense at all. Nationally credentialed interpreters should not need an EIPA score to obtain an education specialty license.</p>
	14.41.06 C: What is the definition of "education or school setting"? Does this generally apply to only K-12 schools?
	<p>2. Section .06C</p> <p>The requirements for provisional licensure in educational settings—passing both the EIPA written exam and achieving a 3.7 on the performance exam—are overly stringent, especially given the absence of a pathway to full licensure. If these high benchmarks only result in a provisional license, it is unclear what the qualifications for a full educational license entail. The lack of transparency in this area is confusing and disheartening to working professionals.</p> <p>Additionally, it is unclear why nationally recognized certifications, such as RID, are not considered acceptable qualifications to work in educational settings. Many RID-certified interpreters have years of experience in K-12 environments and serve as valuable educational team members. By excluding them, the Board is disregarding a critical segment of the profession and weakening access for Deaf students.</p>
	<p>06 Individual License and Specialty Categories</p> <p>.06(C) requires either a RID ED:K-12 credential or an EIPA score of 3.7 for provisional educational licensure. This inflexible standard may prevent qualified interpreters from serving students, even when IEP teams determine they are the most appropriate resource.</p> <p>For example: A Deaf student in a small school district has an IEP team that agrees a familiar interpreter with an EIPA score of 3.5 is best suited to support the students language and social-emotional development.</p>

"Re: Joint Comments and Recommendations for Revisions to COMAR 14.41.01 - Licensing Requirements for Sign Language Interpreters

This joint letter represents the position of the following key stakeholders who serve and support students and school systems impacted by these regulations across Maryland:

Maryland Association of Boards of Education (MABE), representing all of the state's twenty-four local boards of education,
The Public School Superintendents' Association of Maryland (PSSAM), representing all of the state's twenty-four local school superintendents, and
The Maryland State Steering Committee for Deaf and Hard of Hearing Students, a committee with representation from each county in Maryland, Baltimore City, the Maryland State Department of Education (MSDE), and the Maryland School for the Deaf, specifically created by MSDE to address educational concerns in the public school setting for deaf and hard of hearing students.

Together, we write to offer comments on the proposed regulations under COMAR 14.41.01, Licensing Requirements for Sign Language Interpreters. Our goal is to support high-quality interpreting services for students while also ensuring that implementation of new licensure requirements does not unintentionally undermine interpreter access or educational continuity. We bring a variety of expertise as education policy leaders, special education administrators, interpreter providers, and advocates for students who are deaf and hard of hearing, all committed to equitable access and inclusive educational practices.

We appreciate the work of the Governor's Office to elevate standards and safeguard service quality. But we are deeply concerned that several provisions of the proposed regulations present practical, legal, and systemic challenges that could hinder, rather than help, Maryland's students and schools.

Our joint letter attempts not only to identify our concerns, but to provide realistic, practical solutions and suggested language to adopt within the regulations. Our recommendations are grounded in practical experience serving students who are Deaf and Hard of Hearing, in our deep understanding of local infrastructure, and in precedent looking at successful regulatory frameworks in other states in the nation. We appreciate your willingness to consider both our well-founded concerns and our proposed solutions.

Overview of Our Concerns

The regulatory proposal published on May 16, 2025 presents several practical and structural challenges to the educational context. Without meaningful revisions, the proposed regulations risk undermining, rather than enhancing, access to high-quality interpretation services for Deaf and Hard of Hearing students in Maryland. Specifically, the regulations as currently written:

Establish implementation timelines that are unrealistic with the availability of testing, training, and licensure infrastructure in Maryland;

Rely on outdated and unavailable credentials for licensure;

Do not provide conditional or transitional licensure options for interpreters who are in good-faith pursuit of compliance;

Introduce an overly broad suspension and enforcement mechanism that conflicts with public employee rights and collective bargaining agreements; and

Do not acknowledge or adequately accommodate the real-world staffing shortages and economic burdens that school systems across Maryland face.

Each of these issues threatens to impact school system services at a student level. We address these issues, and identify proposed solutions, in turn.

Current Challenges with the Proposed Regulatory Framework

The Proposed Regulations Do Not Account For Structural Barriers to Licensure and Licensure Access.

The proposed regulations contemplate two licensure pathways for educational interpreters, but only one licensure pathway is even viable. Subsection .06(C)(3) references the RID ED:K-12 certification, a credential that has been under a national moratorium since 2016 and is no longer available to new applicants. Therefore, its inclusion as a qualifying standard sets an unrealistic benchmark for new interpreters.

This leaves the EIPA pathway under §.06(C)(4) as the only viable licensure option, and that pathway brings its own substantial barriers. To qualify for licensure using the EIPA, interpreters must pass both the written and performance portions of the EIPA exam. However, both the EIPA written and performance tests are only offered in two locations in Maryland, are costly to access, and are often booked well in advance. For the EIPA performance test specifically, results often take 10 to 12 months or longer to be returned, and unsuccessful candidates are required to wait an additional year after taking their test before retesting. This set of obstacles alone creates a near impossibility for interpreters not already certified under the proposed standards to be able to work by the end of the grace period that

	<p>Why is there no grandfather clause for educational interpreters who have been working in the field for decades? Some of these individuals took the EIPA years ago but if the score that was passing then is not at your standard it now doesn't count. You are asking people who already don't make a lot of money but have decades of experience to take on an additional burden of testing and to what end? We will inevitable lose a lot of experience and be stuck with people who are book smart but may not have the experiential knowledge to support K-12 students especially in special population classrooms with Deaf+ students. How will you deal with the fallout of legal cases and state complaints that will occur because a pool of experienced educational interpreters that was already small is even smaller and students do not have the qualified professional support that they need? This board is not qualified to insert themselves into mainstream public classrooms but is making decisions without making sure that this is appropriate for the practical reality of inclusion classrooms. There is a required notification clause included, how do you propose that students federal service needs are met while the board reviews the "alleged allegations. Again you are inserting yourselves into something that you do not have the structure and capability to support. Educational interpreter regulations should be guided by the needs of the school systems.</p>
	<p>The restriction barring provisional or general license holders (such as those with NIC) from working in specialty areas—particularly educational settings—without a separate specialty license is overly rigid. Requiring an EIPA score of 3.7 and passage of the written exam just to participate in school-related activities (like IEP meetings, classroom interpreting, and school events) creates unnecessary barriers for qualified professionals.</p> <p>This not only limits the pool of available interpreters, particularly in underserved areas, but it also jeopardizes access to critical services for Deaf students and their families. Many capable interpreters with years of relevant experience would be disqualified from performing essential duties, even if they are otherwise fully credentialed and trusted by the communities they serve.</p>
	<p>First I would like more clarification on the expectations for licensure for new interpreters entering the field. After graduation, how are newer interpreters supposed to establish their careers? Previously from my understanding, the provisional license required the written EIPA for educational and NIC for community which is a fair expectation as other states also have a similar provisional license. Now reading the proposal, the provisional license for educational interpreting will require a performance score of 3.7 and the EIPA written. Many states don't even require a 3.5 to work as an educational interpreter so why is our state deciding on 3.7 for a provisional license? How are newer interpreters supposed to learn and improve? Are new college graduates who just spent hundreds of thousands of dollars on their degree expected to work 2-3 jobs just to pay the bills in hopes that one day they may or may not be able to be an interpreter full-time? What about the children in schools who will have their interpreter until December 31st, 2025, but come back to school after Christmas break to find that the law no longer sees their interpreter as "qualified". The school districts in the state are already struggling to fill positions. The student had a perfectly competent interpreter before, but because that interpreter doesn't have an exam score under their name, the student now has to suffer for the rest of the school year due to the lack of "qualified" interpreters.</p> <p>Each of these exams cost anywhere between \$300-500 and the provisional license has discussed needing 2-3 of these exams, which is extremely unrealistic to expect from a new college graduate. The EIPA performance is also taking roughly one entire year to receive results. Who would want a job that requires you to take an exam, not work for an entire year, get your test results back and either meet the requirements or do it all over again? This proposal for the educational provisional license will make it nearly impossible to enter the educational interpreting field if you do not already possess a "passing" score. Licensure is important and so is maintaining quality interpreters for the community, but the appeal of entering the interpreting field is going to plummet from a financial standpoint alone due to all of the examination and licensing fees. In addition, many interpreters will not be able to continue to work based on many other factors such as the wait-time for test scores, restricted work, or lack of formal education (some CODAs). Many of us will need to get another job and steer away from the field either temporarily or permanently until we can meet these requirements which furthers the decreasing appeal for this field.</p>

<p>D. Restrictions.</p> <p>(1) An individual who holds a provisional license to provide sign language interpretation services for the general community may not provide any sign language interpretation services in a specialty area except in a medical setting if part of a formal mentorship or if the individual is accompanied by a licensed sign language interpreter.</p> <p>(2) An individual who holds an education provisional license to provide sign language interpretation services may only provide sign language interpretation in educational programs and services.</p>	<p>Much of an interpreter's professional growth and specialization happens through mentorship and hands-on experience in diverse settings. Entry-level assignments are essential for provisional interpreters to develop real-world skills, identify their strengths, and work toward full licensure and certification. Restricting provisional interpreters from participating in any specialty areas severely limits their ability to explore different domains of the field. This is counterproductive to the long-term goal of cultivating a skilled, adaptable, and resilient interpreting community. As well if an interpreter that is Certified and has many years experience wants to take a few Dr appt or medical jobs, under this version they are unable to do so. It will severely restrict the amount of interpreters who can take jobs, which will negatively impact our Deaf consumers. I respectfully urge the Board to reconsider this section and allow general licensees to accept entry-level assignments in specialty areas without the requirement of a second licensed interpreter—provided the assignment falls within a clearly defined scope, such as low-risk or routine appointments, or is part of a structured mentorship arrangement. This approach would uphold essential consumer protections while also supporting meaningful workforce development. It strikes a balance between maintaining service quality and giving emerging professionals the opportunity to grow, gain exposure, and build the competencies necessary for long-term success in the field.</p>
	<p>Much of the professional growth and specialization process for new interpreters occurs through mentorship and entry-level assignments in various settings. This is how interpreters gain the real-world experience necessary to identify their strengths and build toward licensure and certification. Restricting provisional interpreters from working in any specialty area significantly limits opportunities for professional exploration and growth. This could lead to a workforce of newly licensed interpreters with very narrow experience, which is counterproductive to the long-term goal of building a skilled and flexible interpreting community. I urge the Board to consider revising this section to allow provisional licensees to accept entry-level assignments in specialty areas without requiring a second licensed interpreter, provided the assignment is within a clearly defined scope (e.g., low-risk, routine appointments) or part of a structured mentorship arrangement. This would balance consumer protection with workforce development.</p>
	<p>A significant portion of professional growth and specialization process for new interpreters occurs through mentorship and entry-level assignments in a variety of settings. This is how interpreters gain the real-world experience necessary to identify their strengths and work towards licensure and certification. Restricting provisional interpreters from working in any specialty area significantly limits opportunities for professional exploration and growth. This could result in a workforce of newly licensed interpreters with very narrow experience, which is counterproductive to the long-term goal of building a skilled and flexible interpreting community. I urge the Board to consider revising this section to allow provisional licensees to accept entry-level assignments in specialty areas without requiring a second licensed interpreter, provided the assignment is within a clearly defined scope (e.g., low-risk, routine appointments) or part of a structured mentorship arrangement. This would balance consumer protection with workforce development.</p>
	<p>Without entry-level assignments in a variety of settings, new interpreters can't gain the experience needed to identify strengths, pursue certification and full licensure, and grow professionally. This risks producing inflexible interpreters, undermining the goal of a skilled, adaptable workforce. I encourage the Board to consider revising this section to allow interpreters with a provisional license the ability to accept entry-level assignments in specialty areas without requiring a second licensed interpreter. Such entry level assignments would have to be clearly in low risk situations or routine appointments. This change would balance protection for deaf and hard of hearing consumers with an interpreter's opportunity to continue to develop their skills.</p>
	<p>Much of the professional growth and specialization process for new interpreters occurs through mentorship and entry-level assignments in various settings. This is how interpreters gain the real-world experience necessary to identify their strengths and build toward licensure and certification. Restricting provisional interpreters from working in any specialty area significantly limits opportunities for professional exploration and growth. This could lead to a workforce of newly licensed interpreters with very narrow experience, which is counterproductive to the long-term goal of building a skilled and flexible interpreting community. I urge the Board to consider revising this section to allow provisional licensees to accept entry-level assignments in specialty areas without requiring a second licensed interpreter, provided the assignment is within a clearly defined scope (e.g., low-risk, routine appointments) or part of a structured mentorship arrangement. This would balance consumer protection with workforce development.</p>

Are Medical settings are considered a specialty setting?
 -If yes, what are the qualifications of a Medical Specialist interpreter?

These regulations do not identify what qualifies as "formal mentorship" or ""accompanied by". How will a licensee know if they are in violation of these regulations without a definition?

"...if the individual is accompanied by a licensed sign language interpreter."

I believe it would be more clear if this read '...if the individual is accompanied by a Maryland General License holder
 -One could read it as is and be accompanied by another provisional licensee.
 -One could read this and be accompanied by an interpreter who is licensed in another state.

""...if part of a formal mentorship...""

This is unclear. If provisional interpreter is part of a formal mentorship program, they can work in medical settings without being accompanied by a licensed SLI?

What constitutes a 'formal mentorship'
 -What qualifications are there for a mentor?
 -What requirements of the mentee?
 -What expectations are there for in-person mentorship of the licensee?
 -if the Board is aware of 'formal mentorship' programs, will there be a list online somewhere of 'formal mentorship' programs Licensing will accept?
 -How can a provisional licensee ensure they are practicing in accordance with this regulation?

Requiring provisional licensees to work 'accompanied by a licensed SLI' could create a situation where the regulation doubles the cost of interpreting services for the paying party. Currently medical appointments are typically one interpreter only. With this regulation, it is plausible to think there will now need to be two interpreters at appointments in order to be in alignment with the regulations. This will create an undue burden on the paying party to require two interpreters in medical settings where provisional interpreters will work.

'Accompanied by' needs to be clarified. Is this regulation satisfied if:
 --A MD General License interpreter is their team interpreter at all times in the medical setting?
 -a MD General License interpreter is teaming via VRI?
 -a MD General License interpreter is in the building as a resource?
 -the interpreter reports to a MD General License interpreter on some regular basis for mentoring?
 If the intent of being 'accompanied by a licensed SLI' is quality control or skill development, then this needs to be stated. Otherwise this can be interpreted as being physically present.

How will this regulation be monitored?
 -Are Medical settings are considered a specialty setting?
 -If yes, what are the qualifications of a Medical Specialist interpreter?
 -Will all provisional interpreters need to be in a formal mentorship program, or will only those working in medical settings have this requirement?
 -A medical appointment is confirmed with one provisional and one generalist interpreter. At the last minute the general license interpreter has to cancel. Does the appointment need to be rescheduled because the provisional interpreter is no longer 'accompanied by' a ""licensed SLI"?

I am concerned on the potential impact the expectation that provisional interpreters be teamed with MD General License interpreters in medical settings. More often than not, medical interpreting happens in increments less than an hour. If this regulation remains in place it will mean that in many settings the work that was previously completed by one interpreter will now be done by two interpreters. This is good for the development of the skills of the interpreter and the access to accurate interpretation for the person relying on ASL interpretations. However, there is a concern about resource availability. We now have to staff many medical appointments with two interpreters instead of one. And one has to meet the higher standard of General Licensure. And the provider will have to pay for two interpreters, simply due to the fact that one of the interpreters is not able to prove proficiency sufficient to practice independently. This is not the standard in any other profession.

	<p>4. PROPOSED REGULATIONS: RESTRICTIONS ON GENERAL LICENSEE IN SPECIALTY AREAS:</p> <p>Restrictions on Provisional Licensees in Specialty Areas; ""An individual who holds a provisional license to provide sign language interpretation services for the general community may not provide any sign language interpretation services in a specialty area except in a medical setting if part of a formal mentorship or if the individual is accompanied by a licensed sign language interpreter.""</p> <p>I, personally, feel a lot of the professional growth and specialization process for new interpreters occurs through mentorship and entry-level assignments in various settings. This is how interpreters gain the real-world experience necessary to identify their strengths and build toward licensure and certification. Restricting provisional interpreters from working in any specialty area significantly limits opportunities for professional exploration and growth. This could lead to a workforce of newly licensed interpreters with very narrow experience, which is counterproductive to the long-term goal of building a skilled and flexible interpreting community.</p> <p>I would like to see the Board consider revising this section to allow provisional licensees to accept entry-level assignments in specialty areas without requiring a second licensed interpreter, provided the assignment is within a clearly defined scope (e.g., low-risk, routine appointments) or part of a structured mentorship arrangement. This would balance consumer protection with workforce development.</p> <p>Thank you for your attention to this very important matter to all stakeholders involved, interpreters, Deaf Community and the public.</p>
	<p>I am also concerned about the restriction that prohibits provisionally licensed interpreters from working in medical settings unless they are part of a formal mentorship or accompanied by a licensed interpreter. While I support strong safeguards for critical healthcare situations, I believe this regulation may be too limiting. Many newer interpreters holding provisional licenses are fully capable of handling non-emergency or routine medical appointments, such as physical therapy sessions, dental visits, or follow-up consultations. These types of assignments offer valuable opportunities for early-career interpreters to gain experience, develop their professional judgment, and work toward full certification. Additionally, I respectfully request that the Board more clearly define what constitutes a "medical setting." The current language could be interpreted broadly, potentially excluding provisionally licensed interpreters from basic wellness and outpatient settings where the risks are low and supervision could reasonably be arranged. Clarity around whether routine services—such as chiropractic care, speech therapy, or dental hygiene visits—are considered "medical" would help agencies and interpreters make informed decisions and ensure compliance.</p>
	<p>"Section 6(D)(1): Restrictions on Provisional Licensees in Specialty Areas</p> <p>Provisional or general license holders (NIC) will not be permitted to work in specialty areas, such as educational interpreting, unless they obtain a separate specialty license. to obtain a specialty license for education you must pass the EIPA performance with a 3.7 and pass the written exam.</p> <p>- My score was 3.6. Therefore, as an uncertified interpreter I will not be able to support those in need of services. I do agree we should have standards for educational interpreters, however if we can lower it to a 3.5 or 3.6 with required CEUs then there would be valid reason to believe the interpreters who started with only a 3.5 are doing their due diligence to grow.</p> <p>- Secondly, this restrictions limited support outside the classroom, such as school plays & events, back-to-school nights, IEP meetings, etc.</p> <p>-Third, ""...in a medical setting if part of a formal mentorship or if the individual is accompanied by a licensed sign language interpreter"" medical settings include a range of environments and medical is a huge portion of where interpreters work can come from. This would be a huge impact on the DHOH community. They may have delays in care because the lack of interpreters fa"</p>
	<p>"6 D 1 section is restrictive to EVERY ASL Interpreter. Initial license cost 150.00, is doable. Annual 100.00 fee is cost prohibitive and not state or federally tax deductible. If you make it a business expense to be deductible CLEARLY in the statute and in the licensure requirements, then it is doable. WHO is doing the investigation?? Hearing people with no idea of ASL interpretation. COME ON. This law is a start but it is a messy law.</p> <p>"</p>

	<p>"I have been a Sign Language interpreter in Maryland for the past 13 years. I am writing to express concerns regarding the proposed regulations for the Maryland Sign Language Interpreter Act. We currently have a deficit of interpreters to cover the needs of the many Deaf in this state. Some of the regulations stated below will inevitably reduce the pool of interpreters and make it more difficult to enter this field. This also is putting school systems, hospitals and area businesses at risk or liable of violating Rehab Act or ADA if they cannot easily procure access to interpreters.</p> <p>"Suggested Revision: I urge the Board to consider revising this section to allow provisional licensees to accept entry-level assignments in specialty areas without requiring a second licensed interpreter, provided the assignment is within a clearly defined scope (e.g., low-risk, routine appointments) or part of a structured mentorship arrangement. This would balance consumer protection with workforce development."</p> <p>Concern: Much of the professional growth and specialization process for new interpreters occurs through mentorship and entry-level assignments in various settings. This is how interpreters gain the real-world experience necessary to identify their strengths and build toward licensure and certification. Restricting provisional interpreters from working in any specialty area significantly limits opportunities for professional exploration and growth. This could lead to a workforce of newly licensed interpreters with very narrow experience, which is counterproductive to the long-term goal of building a skilled and flexible interpreting community.</p>
	<p>Concern: My understanding is that specialty licenses are not planned to be enacted January 1, 2026 (other than Education, birth-21). As such, I find it unnecessarily prohibitory to place these restrictions in this section of the regulations, before each specialty's requirements have been further researched and have a timeline for implementation</p> <p>Suggested Revision: I would recommend that restrictions of what type of license (full vs. provisional) is required for various specialty areas be included in the wording for the individual specialty licenses when the time comes for them to be drafted, and consider the intricacies of each specialty on an individual basis after further research for each. This could apply to the ability to work solo vs work in a mentoring situation vs working a teamed assignment with a fully licensed interpreter.</p>
	<p>I am a professional American Sign Language interpreter with over a decade of experience and hold national RID certification, as well as EIPA certification. The proposed legislation is, in my reading, a threat to accessibility for Deaf and Hard of Hearing people.</p> <p>Here are the areas of concern I've identified:</p> <p>Section 6(D)(1): Restrictions on Provisional Licensees in Specialty Areas Provisional or general license holders (NIC) will not be permitted to work in specialty areas, such as educational interpreting, unless they obtain a separate specialty license. to obtain a specialty license for education you must pass the EIPA performance with a 3.7 and pass the written exam.</p> <p>This includes interpreting for: IEP meetings, school plays and events, back-to-School nights, and classroom interpreting.</p> <p>Violating this may result in fines or license suspension, even for well-qualified interpreters working slightly outside their assigned scope.</p>
	<p>.06(D) limits medical interpreting by provisionally licensed interpreters to only those under supervision, making it difficult for healthcare providers to comply with federal access requirements in urgent situations."</p>

	<p>"These regulations do not identify what constitutes a specialty area. Specialty area needs to be defined.</p> <p>These regulations have not identified the qualifications for an interpreter to work in a specialty area.</p> <p>How will an interpreter know whether or not they are qualified to work in a setting without a definition of 'specialty area' and/ or the regulations identifying what skills or qualifications an interpreter needs to have to be qualified to work in a specialty area?</p> <p>What about situations that fall under multiple specialty areas? How can an interpreter be assured they are practicing in alignment with these regulations? Examples include:</p> <ul style="list-style-type: none"> -School nurse- is that education or medical? -School counselor- is that mental health? -DHS investigation- is that legal? If they are investigating an injury, is that medical? -IEPs are legal documents. Does that mean IEP meetings need a legal interpreter? -Medial appointment where abuse is disclosed and it is reported -How will these restrictions be monitored? -medical or mental health appointments when working with incarcerated people -educational programming for children in medical or mental health long-term care -law enforcement comes to the emergency room/ hospital to interview a patient -DHS comes to a school to interview a student/ staff in regards to an investigation -School resource officer wants to check on a student to ask quesitons about some illegal behavior
	<p>The requirement of formal mentorship for uncertified interpreters is too lax and leaves it up to persons to just be in kind of program without guidelines on what the plan is to ensure those interpreters are qualified to work.</p>
	<p>4. Provisional Licenses: The current framework limits provisional licensees to work in medical settings under strict conditions (e.g., as part of a mentorship or when accompanied by a fully licensed interpreter). Restricting provisional licensees from independently working in medical settings unless a formal mentorship is in place will further constrain interpreter availability, potentially delaying care and increasing legal and clinical risk for hospitals.</p> <p>We recommend allowing provisional licensees to practice independently in medical settings after meeting defined competency criteria (e.g., CEUs, supervision hours), especially when licensed interpreters are not available.</p>
	<p>I have gotten feedback from the Deaf community that in-person interpreters are already scarce and these new regulations will worsen a problem that already severely impacts the community in a negative way. For the new medical regulations, how are interpreters under the provisional license working in the medical field? Some CODAs and other very qualified interpreters who have been working in medical settings for years are now required to have a mentor just to perform a job that many of us have already been doing? How are we supposed to support our families and pay our bills? Many places can barely afford to pay for a single interpreter, with this new licensure is it expected to pay two interpreters for medical interpreting if one is not fully licensed? Why is the state of Maryland discussing such regulations when no other state in the country has this level of specificity? The provisional license cannot make it impossible to earn a living wage for someone who just spent four years of their life getting a degree for this career.</p>
E. Validity Period. A provisional license is valid for 3 years from the date of issuance.	<p>Nothing about the validity period and renewal of the general license is included in Section .05 or Section .07. I think you need to add these two items to Section .05 for the general license and also add to Section .07 for the agencies license.</p>
F. Renewal for Provisional General Community License. An individual may only renew a provisional license one time for an additional 2-year period if the individual: (1) Earns 2.0 units (20 hours) of continuing education in interpreting and relevant topics; (2) One of the hours required in § E(1) of this regulation shall include power, privilege, and oppression (PPO) studies.	<p>Are there criteria for the entity providing the continuing education units? Is the expectation the CEUs will come from an accredited source? There are no listed requirements for renewal of the General license. There is no language that states the CEUs be from a reputable/ accredited source.</p>

<p>G. Renewal for Provisional Education Specialty. An individual may only renew a provisional education specialty one time for an additional 2 years if the individual:</p> <p>(1) Earns 2.0 units (20 hours) of continuing education in educational interpreting and relevant topics;</p> <p>(2) One of the hours required in § F(1) of this regulation shall include power, privilege, and oppression (PPO) studies, including deaf culture, deaf awareness, and diversity in education.</p>	<p>Are there criteria for the entity providing the continuing education units? Is the expectation the CEUs will come from an accredited source? There are no listed requirements for renewal of the General license. There is no language that states the CEUs be from a reputable/ accredited source.</p>
<p>H. Expiration. An individual may not hold a provisional license for more than 5 years.</p>	<p>Note on H. Expiration - five years is half of the students' educational life and that is not ethical. "</p>

Regulations	Concerns/Comments
<p>A. Agencies shall be registered as a business in good standing with the State of Maryland and provide the following information to the Office:</p> <p>(1) Name;</p> <p>(2) Areas of interpreting services provided;</p> <p>(3) Proof of legal existence; and</p> <p>(4) Proof of good standing</p>	
<p>B. Agencies shall provide provisionally licensed or fully licensed interpreters in all settings.</p>	<p>("Agencies shall provide provisionally licensed or fully licensed interpreters in all settings"). Within the cited regulation, I recommend and request the word "provide" be removed and replaced with "arrange for." This further clarifies the difference between an interpreter referral agency (i.e. an Agency) and a sign language interpreter (i.e. those entities providing the actual sign language interpretation services). The clarification will then clearly delineate the required registrations, applications, and licenses required of each entity based on their function in the context of sign language interpretation services. As currently written, an Agency, as an entity, may need to obtain a General License as that individual entity for providing sign language interpreting services.</p> <p>Changes would need to be made throughout to align the updates</p>
	<p>The requirement that agencies use only licensed interpreters creates compliance issues during shortages and emergencies.</p> <p>Consider a high-stakes employment scenario: A Deaf job seeker has an interview scheduled with a federal contractor. The interpreter the agency usually uses is booked, and the backup is nationally certified but not yet licensed in Maryland. Under these rules, the interview might proceed without any interpreter—or be rescheduled, creating inequity in the hiring process.</p> <p>I recommend including a good-faith exception clause to protect agencies that have made every effort to secure licensed personnel.</p>
.07(B)	requires agencies to use only licensed or provisionally licensed interpreters

Regulations	Concerns/Comments
<p>C. If the requester is requesting one type of service and the consumer prefers the other type, the interpreter or agency shall not provide sign language interpreting services.</p>	<p>the interpreter nor the agency shall provide services when Consumer's choice is not honored. What documentation is the consumer providing to show, for example they requested an 'onsite' interpreter but VRI was scheduled? By the time the interpreter learns the consumer may not want VRI the VRI interpreter is already 'online'. Could it cause more harm to 'back out of the VRI' session when VRI is already in progress? What is the time frame for the consumer to lodge a complaint? Look again at this section for all the 'what ifs' that cannot be resolved.</p>
	<p>We are asking for exceptions to be granted for St Mary's, Charles, and Calvert counties. Due to the rural nature of our region we have very few interpreters and since they travel over three counties logistics are difficult enough as it is. We stand to lose most of our interpreters because of the certification requirements, which isn't protecting the Deaf, it's hurting the Deaf.</p> <p>We ask that Deaf preference be given top priority not only in person vs remote, but our preferred agencies and specific interpreters regardless of their license or certification status. If the Deaf consumers are content with an interpreter's work then that should be all that truly matters. We want the Deaf community in general to have final say with who is and is not qualified to do the job. Our region has become a close knit community of Deaf individuals, hearing interpreters, CODAs, and advocates. We have nurtured these relationships and this community into a thriving Deaf centered ecosystem that benefits us all. Deaf people know the needs of their community better than anyone else and here in SoMD the choice has been made. Regardless of titles earned and positions held, the Deaf community has chosen people with humble servant hearts to do life alongside. Interpreters are more than a resource, interpreters walk alongside their Deaf clients in all stages of life, from birth, to death, from a bad diagnosis to weddings. We have a symbiotic relationship where the interpreter needs to be more than just linguistically and culturally skilled, they need to be trustworthy and comfortable, they need to be able to make their Deaf clients feel at ease. If a Deaf person already has to have an extra person in the room during the most vulnerable, scary moments of their lives then it should be someone they know and trust regardless of their qualifications.</p>
	<p>We are asking for a change in the amount of time allowed in emergency situations. We are requesting that an unlicensed interpreter can work an emergency job for up to four hours while a licensed interpreter is being tracked down. We are requesting four hours because of the logistical complexity in our more rural regions. If the licensed interpreter is at another job, four hours gives them time to finish up the job, or get another interpreter to replace them on the job. Four hours gives the licensed interpreter time to get from point A to point B, if they're in rush hour traffic driving from one end of the region they cover to the other it could easily be a two hour trip. Between wrapping up what they're currently doing, getting to the emergency, and maybe stopping for gas and/or food, four hours should be enough time to get a licensed interpreter to the location most of the time. One hour is simply not enough time as some of our hospitals are already an hour away from our interpreters.</p>

	<p>Regarding Section 8(D), the allowance of VRI for only sixty (60) minutes in emergency situations may be insufficient, especially in rural areas where it can take significantly longer to arrange for a live interpreter to arrive. Limiting virtual services to this timeframe risks cutting off communication before effective onsite coverage is available." I urge the Board to revise these sections to:</p> <p>For emergency services, allow the Deaf consumer to consent to continued VRI beyond sixty minutes while best efforts continue to secure an onsite interpreter.</p> <p>This approach respects the consumer's autonomy while acknowledging real-world limitations on interpreter availability and ensures Deaf individuals are not left without access, particularly in urgent or rural situations.</p>
	<p>While respecting the preferences of Deaf consumers is essential, the current language in Section 8(C) creates a situation where no services are provided if the requester and the Deaf consumer disagree on the mode of interpreting service. If no services are provided until a resolution is reached, Deaf people will frequently be left without interpretation—effectively denying access.</p> <p>I urge the Board to revise these sections to:</p> <p>Ensure good faith efforts are made to accommodate the Deaf consumer's preference.</p> <p>If no suitable onsite interpreter can be found, the Deaf consumer should be offered the option to accept virtual interpreting services, rather than denied services.</p>
	<p>Regarding Section 8(D), the allowance of VRI for only sixty (60) minutes in emergency situations may be insufficient, especially in rural areas where it can take significantly longer to arrange for a live interpreter to arrive. Limiting virtual services to this timeframe risks cutting off communication before effective onsite coverage is available. For emergency services, allow the Deaf consumer to consent to continued VRI beyond sixty minutes while best efforts continue to secure an onsite interpreter.</p> <p>This approach respects the consumer's autonomy while acknowledging real-world limitations on interpreter availability and ensures Deaf individuals are not left without access, particularly in urgent or rural situations.</p>
	<p>"While respecting the preferences of Deaf consumers is essential, the current language in Section 8(C) creates a situation where no services are provided if the requester and the Deaf consumer disagree on the mode of interpreting service. If no services are provided until a resolution is reached, Deaf people will frequently be left without interpretation—effectively denying access.</p> <p>I urge the Board to revise these sections to:</p> <p>Ensure good faith efforts are made to accommodate the Deaf consumer's preference.</p> <p>If no suitable onsite interpreter can be found, the Deaf consumer should be offered the option to accept virtual interpreting services, rather than denied services.</p>
	<p>Regarding Section 8(D), the allowance of VRI for only sixty (60) minutes in emergency situations may be insufficient, especially in rural areas where it can take significantly longer to arrange for a live interpreter to arrive. Limiting virtual services to this timeframe risks cutting off communication before effective onsite coverage is available. For emergency services, allow the Deaf consumer to consent to continued VRI beyond sixty minutes while best efforts continue to secure an onsite interpreter.</p> <p>This approach respects the consumer's autonomy while acknowledging real-world limitations on interpreter availability and ensures Deaf individuals are not left without access, particularly in urgent or rural situations.</p>

<p>.08 Consumer Choice.</p> <p>A. Interpreters and agencies shall provide sign language interpreting services via VRI or on-site, in-person interpreting according to the preference of the consumer.</p>	<p>-How will this be monitored?</p> <p>-What are the consequences to the paying party/ interpreter/ agency</p> <p>-How will this be managed</p>
<p>D. In the case of an emergency, interpreters and agencies may provide sign language interpreting services via VRI for up to sixty (60) minutes.</p>	<p>What constitutes an emergency?</p> <p>What about a State of Emergency as declared by Maryland or the Federal Government?</p>
	<p>When an agency is contacted, the majority of the time the 'requester of the services' is the paying party. Interpreters are not able to access the requestor of services any questions about preference for mode of interpreting.</p> <p>-How can interpreters practice in alignment with this regulation?</p> <p>-What education is planned to alert requestors they need to now ask the ASL users their preference?</p> <p>-How will the preference be documented?</p> <p>-How will agencies and interpreters document the preference?</p> <p>-How will this be enforced?</p> <p>Interpreters often work through agencies. There are many layers of service providers between the Deaf person, the paying party who requests the services, the interpreting agency who offers the work, and the interpreter who accepts the assignment.</p> <p>As a licensee, how am I able to ensure this regulation is being followed?</p>
	<p>Respecting the preferences of Deaf consumers should be a top priority. If I understand the current language in Section 8(C) correctly, it creates a situation where no services are provided if the requester and the Deaf consumer disagree on the mode of interpreting service. If no services are provided, Deaf people will be left without interpretation. I urge the Board to revise these sections to:</p> <p>Ensure good faith efforts are made to accommodate the Deaf consumer's preference.</p> <p>If no suitable onsite interpreter can be found, the Deaf consumer should be offered the option to accept virtual interpreting services, rather than denied services.</p>

	<p>"My concern is when the Deaf consumer and the hiring entity disagree and no interpreter is provided. How is that helping anyone?? Agencies should add a new line item in their request for service forms asking what the Deaf consumer's preference is and leave it at that. In the end it doesn't even matter what the hiring entity wants, cause if they disagree they get no one.</p> <p>This is also a point in the regs that needs to be made clear to everyone in MD, not just the Deaf and interpreters. Deaf consumers need to know that they'll have to state their preference when making appointments and whoever is requesting interpreters will need to know to ask. How are we getting the word out to everyone. As it is there are still a lot of people in the Deaf/hoh/interpreting world that still don't know what's going on let alone all the people that now have a new line item they'll need to make sure to check before they let the Deaf person go. This news needs to be spread far and wide or there's going to be a lot of back tracking to try and get that info after the fact.</p> <p>Complaints should not be handled by the board that also made the regulations. A separate board should be established so they can remain neutral. Our concern with the same board writing regulations and handing complaints is that you'll know a lot of the names and people you come upon, you can't stay neutral if you know someone involved in a complaint. You also know what you meant in writing the regulations, you see both the letter and the spirit of the law wearas as lot of us in the community are still trying to fully understand all the implications. The board runs the risk of judging people on what they meant rather than by what the regulations and law actually say. Outside parties will be more able to judge with neutrality using nothing more than the framework that the public has access to.</p> <p>Also, please clarify if the general license is enough to sub in the school system? ""</p>
	<p>Secondly, I am concerned about the 60 minute cap on emergency VRI services. What happens in a medical situation when it's past 60 minutes and the in person Interpreter has yet to arrive, for any reason? Do I, for fear of having my license revoked, disconnect mid emergency because of that cap? Again, this is something that should be between the hiring entity and whomever is filling the contract, not necessarily the subcontracting provider.</p>
	<p>2. CONSUMER PREFERENCES:</p> <p>While I agree with the intent behind it, requiring both the Interpreter AND the agency to ask the request for clarification on whether the Deaf person prefers a virtual or in person is unrealistic. As someone who does significant subcontract work through agencies, I do not have access to the requester. That is something the hiring entity and the agency need to negotiate. Secondly, I am concerned about the 60 minute cap on emergency VRI services. What happens in a medical situation when it's past 60 minutes and the in person Interpreter has yet to arrive, for any reason? Do I, for fear of having my license revoked, disconnect mid emergency because of that cap? Again, this is something that should be between the hiring entity and whomever is filling the contract, not necessarily the subcontracting provider.</p>
	<p>Deaf consumer choice, in person vs VRI, when it conflicts with the hiring entity's choice the agency is to send no one. That benefits no one. Agencies and interpreters should add a new line item as to what the DC's preference is and leave it at that."</p>

	<p>Firstly, while I agree with the intent behind it, requiring both the Interpreter AND the agency to ask the request for clarification on whether the Deaf person prefers a virtual or in person is unrealistic. As someone who does significant subcontract work through agencies, I do not have access to the requester. That is something the hiring entity and the agency need to negotiate.</p>
	<p>We are asking for a change in the amount of time allowed in emergency situations. We are requesting that an unlicensed interpreter can work an emergency job for up to four hours while a licensed interpreter is being tracked down. We are requesting four hours because of the logistical complexity in our more rural regions. If the licensed interpreter is at another job, four hours gives them time to finish up the job, or get another interpreter to replace them on the job. Four hours gives the licensed interpreter time to get from point A to point B, if they're in rush hour traffic driving from one end of the region they cover to the other it could easily be a two hour trip. Between wrapping up what they're currently doing, getting to the emergency, and maybe stopping for gas and/or food, four hours should be enough time to get a licensed interpreter to the location most of the time. One hour is simply not enough time as some of our hospitals are already an hour away from our interpreters.</p>
	<p>VRI PREFERENCE</p> <p>I absolutely understand and agree with the Deaf consumer preference of an in-person interpreter over a virtual interpreter. Again, I appreciate the spirit of the regulation, but the real-world application of that regulation will hurt the Deaf community.</p> <p>The option of VRI must be kept open to better serve the Deaf community. Last-minute requests, for example, have a greater chance of being filled if VRI is an option. In rural areas especially, it is more challenging to secure an on-site interpreter. Many times, a virtual interpreter is better than no interpreter. (There are exceptions, of course.)</p> <p>I am addressing situations where a virtual interpreter is a match for the situation and truly does provide access. In medical settings, it often is not. Should the regulation delineate that VRI should not be used in medical situations?</p> <p>The item of a 60-minute VRI limit until onsite interpreter arrives would be difficult to navigate. Suppose there is no on-site interpreter available? Suppose it is a medical emergency, and the interpreter has worked 60 minutes and must leave at the 61st minute, just as the medical situation intensifies. What then?</p> <p>Additionally, the language that states interpreters shall not provide services virtually if the request was for an in-person interpreter. Service requests are made between the hiring entity and the sign language agency. The implication is that the interpreter is involved in the request. They are not. They should remain out of that process and follow the direction of the sign language agency. There is no way an interpreter, who is assigned after the request is made, to know what or who made the request, what is requested, etc. This adds a layer that is guaranteed to cause miscommunication and confusion, resulting in less service to the Deaf community. The sign language interpreting agency should be responsible for fulfilling the consumer's preference to the best of their ability. If no on-site interpreter is available, then VRI must remain an option so that the consumer is not without.</p>

	<p>In most cases, an agency or interpreter will NOT know what the consumer has requested.</p> <p>The responsibility should be on the requestor to honor the request, not the interpreter or agency.</p>
	<p>The proposed language under “Consumer Choice” raises significant concerns for the Maryland Judiciary, particularly with respect to its ability to ensure timely and effective access to sign language interpretation services. The provision would require interpreters and agencies to deliver services strictly based on the consumer’s preference either via video remote interpreting (VRI) or on-site.</p> <p>The Judiciary is committed to providing accessible court services and currently offers ASL interpreting both on-site and remotely. The mode of service is determined by the type of hearing and the availability of interpreters. Remote interpreting is generally used for emergency and on-demand hearings, where the urgent nature of proceedings and unavailability of on-site interpreters on such a short notice makes in-person interpreting unfeasible. In such cases, VRI is the only practical and available option, as on-site interpreters are typically booked in advance.</p> <p>Under the proposed requirements, if a consumer controls the type of services they would like to have (on-site or remote), the Judiciary may not be able to provide services at all. This restriction could inadvertently deny the consumer access to interpretation services, potentially resulting in postponed hearings or delayed access to justice. It also removes the necessary flexibility that courts have which allows them to balance interpreter availability, scheduling logistics, and the nature of judicial proceedings.</p> <p>We believe that this section, if enacted, may unintentionally harm the very individuals it seeks to protect by precluding access to any ASL interpretation in cases where the preferred service mode is unavailable. The Judiciary recommends incorporating language that allows reasonable accommodations based on interpreter availability while preserving the consumer’s preference as a key consideration.</p>
	<p>Finally, the regulations state that, “If the requester is requesting one type of service and the consumer prefers the other type, the interpreter or agency shall not provide sign language interpreting services.” COMAR 14.41.08(C) (Proposed). This is a luxury that is not available to the Maryland courts. The courts have an obligation to hear matters brought before them in accordance with the Constitution and laws of Maryland. The courts have an obligation under Title II of the Americans with Disabilities Act to provide a reasonable accommodation when needed. The courts cannot simply terminate a proceeding because it is unable to provide the type of service preferred by the public user.</p>

Finally, the licensing regulations do not provide sufficient leeway for courts to address emergency or urgent matters. There are times when no interpreter has been requested or when an interpreter is not available. The court may need to be able to explain the situation to a deaf or hard of hearing individual, or to communicate effectively so the matter can be reset. The court needs to be able to use on demand services like VRI interpreters in these instances.

Members of the public may appear before the courts to apply for or respond to emergency proceedings including protective orders, peace orders, emergency custody proceedings, and initial appearances. District Court commissioners, for example, are available 24 hours a day, 7 days a week. Commissioners conduct initial appearances, issue charging documents, set and accept bonds, and determine conditions of pretrial release for individuals arrested within the District Court's jurisdiction. Commissioners also hear petitions for peace and protective orders during hours when the courts are otherwise closed. Courts are obliged to hear these matters within strict timelines.

When an individual who appears or is brought before the court in these matters requires a sign language interpreter, the court needs the flexibility to provide that interpreter on demand. The requirement for out-of-state video remote providers to be licensed and the provision that mandates that public users be able to choose the type of interpreting services (onsite or remote) they prefer will make it difficult if not impossible for the court to fulfill its statutory mandates.

The regulations state that "In the case of an emergency, interpreters and agencies may provide sign language interpreting services via VRI for up to sixty (60) minutes." COMAR 14.41.08(D) (Proposed). Initial appearances, peace and protective orders, and other hearings conducted on short notice are part of the normal course of business for the Maryland courts. Nor is the term "emergency" defined in the regulations. It is not clear that these types of activities would qualify as emergencies under the regulations. Nor can the Maryland courts guarantee that these types of proceeding can be concluded within 60 minutes in any given case.

	<p>While respecting the preferences of Deaf consumers is essential, the current language in Section 8(C) is problematic for three reasons.</p> <ol style="list-style-type: none"> 1. Requiring both the Interpreter and the agency to ask the Deaf consumers preference is not feasible in many cases, because subcontracted interpreters often have no direct contact with the requester or consumer prior to an assignment and thus cannot verify or negotiate such details. 2. The language as written can create situations where no services are provided if the requester and the Deaf consumer disagree on the mode of interpreting service. If no services are provided until a resolution is reached, Deaf people will frequently be left without interpretation—effectively denying access. 3. Regarding Section 8(D), the allowance of VRI for only sixty (60) minutes in emergency situations may be insufficient, especially in rural areas where it can take significantly longer to arrange for a live interpreter to arrive. If the impetus is on the contracted interpreter to manage the 60 minute timeframe, this means they may log off in the middle of interpreting an emergency situation in order to protect their license from threat of being suspended due to noncompliance of this predetermined time limitation. <p>Suggested Revision:</p> <p>I urge the Board to revise these sections to:</p> <p>A) Ensure good faith efforts are made to accommodate the Deaf consumer's preference, and require agencies or hiring entities (not individual interpreters) to verify consumer preference for VRI or in-person services</p> <p>B) If no suitable onsite interpreter can be found, the Deaf consumer should be offered the option to accept virtual interpreting services, rather than denied services. And</p> <p>C) Permit VRI to continue beyond 60 minutes in emergencies, with informed consent from the Deaf consumer, while best efforts are made to secure on-site services.</p> <p>This approach respects the consumer's autonomy while acknowledging real-world limitations on interpreter availability and ensures Deaf individuals are not left without access, particularly in urgent or rural situations.</p>
	<p>While respecting the preferences of Deaf consumers is essential, the current language in Section 8(C) creates a situation where no services are provided if the requester and the Deaf consumer disagree on the mode of interpreting service. If no services are provided until a resolution is reached, Deaf people will frequently be left without interpretation—effectively denying access.</p> <p>I urge the Board to revise these sections to:</p> <p>Ensure good faith efforts are made to accommodate the Deaf consumer's preference.</p> <p>If no suitable onsite interpreter can be found, the Deaf consumer should be offered the option to accept virtual interpreting services, rather than denied services.</p>

	<p>Regarding Section 8(D), the allowance of VRI for only sixty (60) minutes in emergency situations may be insufficient, especially in rural areas where it can take significantly longer to arrange for a live interpreter to arrive. Limiting virtual services to this timeframe risks cutting off communication before effective onsite coverage is available. For emergency services, allow the Deaf consumer to consent to continued VRI beyond sixty minutes while best efforts continue to secure an onsite interpreter.</p> <p>This approach respects the consumer's autonomy while acknowledging real-world limitations on interpreter availability and ensures Deaf individuals are not left without access, particularly in urgent or rural situations.</p>
--	--

"Maryland's current rules, however, offer no mechanism for consumers to waive state registration or certification requirements and choose the interpreter who best meets their communication needs; a right preserved under federal law. Without a waiver system, institutions may insist on using only state-licensed ASL interpreters, even when those interpreters lack the necessary skills in the consumer's preferred mode (e.g., ProTactile or Signed English). This approach undermines individual autonomy and denies access to truly effective communication.

It is critical not to assume that interpreters proficient in these systems (which lack formal certifications) are able, or required, to obtain RID certification. These modes reflect distinct skills, not assessed by national certifying bodies. Similarly, RID certification does not guarantee proficiency in these communication methods, which demand specialized training and experience.

Failing to recognize this distinction risks recreating the so-called "warm body" problem, where institutions assign any available certified interpreter regardless of actual communication fit, leading to miscommunication, confusion, and exclusion.

Consumer Choice Is Central to Effective Communication

Federal ADA Requirements: The ADA mandates that auxiliary aids and services—including interpreters—be selected in consultation with the individual with a disability to ensure that communication is equally effective (28 C.F.R. § 35.160(b)(2)).

Lack of Certification for Common Modalities: Many Deaf, Hard of Hearing, and DeafBlind individuals rely on communication modes such as ProTactile or Signed English, for which no certification pathway currently exists. Requiring state licensure tied to ASL certification unjustly excludes these qualified interpreters.

Precedent in Neighboring States: Pennsylvania explicitly allows a consumer choice waiver under its interpreter licensure law (Pa. Code § 501.5. Exemptions), permitting consumers to use interpreters not state-certified when they best meet the consumer's needs. "7. Needed Support for Consumer Autonomy Under the ADA

Under the Americans with Disabilities Act (ADA), public entities and, by extension, interpreting regulations, must ensure effective communication tailored to the individual needs of people with disabilities (28 C.F.R. § 35.160(b)(2)). This determination must be made in consultation with the person involved, not unilaterally by agencies or institutions.

"Recommendation: Establish a consumer choice waiver allowing individuals to request interpreters they trust, regardless of licensure status. This would:

1. Honor individual autonomy;
2. Provide flexibility in high-need or low-access contexts (e.g., rural or emergency settings);
3. Ensure compliance with the ADA's requirement for equally effective communication;
4. Align Maryland with inclusive practices already implemented in neighboring states."

8. COMAR 14.48.01.08: Balancing Consumer Choice, Timely Access, and HIPAA Compliance

While consumer choice is essential, COMAR 14.48.01.08 in its current form introduces significant operational, legal, and ethical risks. A revised framework, one that preserves autonomy and ensures timely access, will better serve the real-world needs of Maryland's Deaf and Hard of Hearing communities while maintaining compliance with HIPAA and ADA standards.

Issue 1: Unrealistic Burden on Agencies and Interpreters

Sections B and C of COMAR 14.48.01.08 require interpreters and agencies to verify a Deaf or Hard of Hearing consumer's real-time preference between in-person and Video Remote Interpreting (VRI) prior to accepting any request. While well-intentioned, this mandate creates impractical delays in high-stakes environments such as hospitals, courtrooms, and emergency response situations; settings in which interpreter availability is already limited, and timeliness is critical.

This requirement places agency staff and interpreters in a difficult position, caught between honoring consumer preferences and meeting urgent access needs.

Issue 2: Risk of HIPAA Violations and Harm

Under HIPAA and federal disability rights law, covered entities must ensure timely and effective communication for patients who are Deaf or Hard of Hearing. If a hospital urgently requests a VRI interpreter, but consumer preference is unknown or cannot be verified, Section C currently requires services to be withheld until that preference is confirmed.

This policy risks:

1. Delaying urgent care;
2. Violating HIPAA standards (e.g., 45 C.F.R. § 92.102);
3. Exposing providers and agencies to legal liability.

Issue 3: Disconnect Between Requesters and Consumers

In many cases, the individual making the interpreter request is a staff member (e.g., nurse, school administrator), not the Deaf consumer themselves. If the consumer is unavailable, unconscious, or unaware that a request is being made on their behalf, agencies may be unable to verify preference.

Strict enforcement of Section C under these circumstances can result in no interpreter being sent at all, despite urgent need and undermining the accessibility it seeks to protect.

Issue 4: Limitations on Direct-Hire Interpreters

Direct-hire interpreters in institutional settings (hospitals, courts, schools) often operate on strict schedules and caseloads. Pausing or declining assignments to verify consumer preference mid-shift may:

1. Disrupt essential services;
2. Delay surgeries, hearings, or academic services;
3. Create staffing and scheduling chaos.

	This should be the Consumer Choice they want a certain Interpreter should not matter if Certified or not it is a choice.
	This should be the Consumer Choice they want a certain Interpreter should not matter if Certified or not it is a choice.
	Regarding Consumer Choice, the regulations will prevent all Maryland citizens from using non-certified interpreters that they deem highly skilled for their own public, private and/or personal events. The financial burden Maryland citizens incur as consumers of interpreting services could be significant. It may also deter inclusivity, and possibly reduce social interactions overall—if private citizens are unable to afford certified sign language interpreter rates for their personal and/or private events.
	<p>Clarify the Scope and Limitations of Employer Licenses</p> <p>Employer licenses should apply solely to interpretation services provided to the licensee’s own employees or job applicants. For example, the requirement applicable to agency licensees to provide interpreter services in “all settings” should not apply to employer-licensees. Similarly, an employer license should not correspondingly obligate an employer to “provide sign language interpreting services via VRI or on-site, in-person interpreting according to the preference of the consumer.” Rather, consistent with the requirements imposed by the ADA and by Maryland law, employers should retain the discretion to provide virtual or remote interpreter services instead of in-person services, so long as such virtual or remote interpreter services allow: (i) applicants to participate fully in the hiring process; and (ii) employees to perform the essential functions of their job.</p> <p>Additionally, the proposed consumer choice provisions may unintentionally limit access to timely interpreting services. With only approximately 500 licensed interpreters available⁴ to service over 1.2 million deaf or heard-of-hearing individuals in Maryland⁵, requiring in-person interpreting according to consumer preference is often not practical – particularly in rural areas or during off-hours when in-person interpreters may not be available. We recommend striking Sections C and D of COMAR 14.41.01.08 and revising Sections A and B to state that efforts should be made to accommodate the consumer’s preferred modality whenever feasible.</p>
	<p>While respecting the preferences of Deaf consumers is essential, the current language in Section 8(C) creates a situation where no services are provided if the requester and the Deaf consumer disagree on the mode of interpreting service. If no services are provided until a resolution is reached, Deaf people will frequently be left without interpretation—effectively denying access.</p> <p>I urge the Board to revise these sections to:</p> <p>Ensure good faith efforts are made to accommodate the Deaf consumer’s preference.</p> <p>If no suitable onsite interpreter can be found, the Deaf consumer should be offered the option to accept virtual interpreting services, rather than denied services.</p>

	<p>While respecting the preferences of Deaf consumers is essential, the current language in Section 8(C) creates a situation where no services are provided if the requester and the Deaf consumer disagree on the mode of interpreting service. If no services are provided until a resolution is reached, Deaf people will frequently be left without interpretation—effectively denying access.</p> <p>Ensure good faith efforts are made to accommodate the Deaf consumer's preference.</p> <p>If no suitable onsite interpreter can be found, the Deaf consumer should be offered the option to accept virtual interpreting services, rather than denied services.</p>
	<p>I wrk through agencies and I am not a scheduler. How will i be aware of the consumer's choice of in person or VRI service? What happens when I show up in person for an assignment and learn that the consumer preferred a virtual session? Am I to leave?</p>
	<p>Section 8(D)'s 60-minute VRI limit in emergencies may be insufficient, especially in rural areas where live interpreters take longer to arrive. This risks communication gaps before onsite coverage is available. I urge the Board to revise these sections to:</p> <p>For emergency services, allow the Deaf consumer to consent to continued VRI beyond sixty minutes while best efforts continue to secure an onsite interpreter.</p> <p>This approach respects the consumer's autonomy while acknowledging real-world limitations on interpreter availability and ensures Deaf individuals are not left without access, particularly in urgent or rural situations.</p>
	<p>"I have concerns in the area of .08 Consumer Choice of the draft regulations</p> <ol style="list-style-type: none"> 1. The term consumer isn't defined. I assume they are talking about the deaf/hard-of-hearing party but they aren't the only consumer in an interpreted interaction, those who aren't deaf or hoh are also consumers. What if their preferences are not aligned? 2. It says in item B, prior to accepting a request for services interpreters and agencies must ask the consumer if they prefer VRI or in person interpreting. <ol style="list-style-type: none"> a. Who is the consumer? b. What if there are more than one consumer with different preferences? c. If the agency hiring the interpreter doesn't ask, is the interpreter held responsible? 3. Item C says if the requester is asking for one type of service and the consumer prefers another type, the interpreter/agency shall not provide services. <ol style="list-style-type: none"> a. How would the agency or interpreter know if the requestor asked the deaf/hoh consumer? b. Again, the requestor is a consumer. c. Does this provision align with the ADA and providing accommodations that are effective even if they aren't exactly what is asked for? 4. Item D says, in emergencies, you can provide VRI for up to 60 mins. <ol style="list-style-type: none"> a. Should the interpreter hang up a VRI call at the 60 min mark if an onsite interpreter isn't present? 5. General thoughts: <ol style="list-style-type: none"> a. This provision is written in a way that assumes VRI is bad, deaf/hoh people are the only consumers, and interpreted interactions only have one consumer. These are all false assumptions. b. While this provision says both interpreters and agencies are responsible for finding out preference of the consumer, there are only consequences under .11, for interpreters and not agencies. Individual interpreters would be held responsible if the agency they work for either didn't ask or didn't tell the interpreter they were being put in a situation that violated this provision. <p>"</p>

	<p>14.41.08: When an entity makes a request with an agency, we follow the request they provide, whether the request is onsite or virtual. Agencies generally do not have direct contact with the consumer. Therefore, we assume requestors will need to ensure that preference is annotated properly.</p>
	<p>14.41.08 D: We assume that if an onsite interpreter is not available in 60 minutes (because of a remote geographic location, lack of licenses interpreters in the area, etc) that the use of a video interpreter will be allowed beyond 60 minutes due to the emergent nature of the request.</p>
	<p>On behalf of Maryland's hospitals and health systems, we are writing to comment on the recently published regulations on the licensing requirements for sign language interpreters. We applaud the Board of Sign Language Interpreters' efforts and share your goal of ensuring access to qualified interpreter services for deaf and hard of hearing Marylanders. Maryland hospitals are deeply committed to this mission and want to ensure these regulations do not inadvertently limit access to healthcare.</p> <p>Maryland's hospitals and health systems have several concerns with the proposed regulations. We are concerned that the regulations, as currently written, may unintentionally limit access to qualified interpreter services for deaf and hard of hearing patients. Therefore, we request that the Board consider the following comments and amend these regulations as detailed below:</p> <p>1. Patient Choice re: In-Person vs. Remote Interpreters: Maryland hospitals make every effort to accommodate patient requests for sign-language interpreter services. However, given the shortage of sign language interpreters, the consumer choice requirement will likely limit access to timely care. There are less than 500 ASL interpreters to serve the over 1.2 million deaf and hard of hearing Marylanders. In-person interpreters are often not available immediately or at all, especially in rural hospitals or during off-hours. In many clinical scenarios, particularly in emergency departments, waiting for an in-person interpreter can be medically dangerous. Although the regulations permit the use of video remote interpreting (VRI) for a limited time in case of emergencies, it is unclear what constitutes an emergency per the regulations. Maryland hospitals make every effort to accommodate patient preferences, but in time sensitive, high-acuity situations, or in rural and under-resourced areas, they must rely on VRI as a critical lifeline. Barring the use of VRI solely because a patient prefers in-person services, when no in-person interpreter is available, could lead to delayed care, and potential clinical harm.</p> <p>Given this, we recommend striking sections C and D of 14.41.01.08 and revising the language in sections A and B to reflect that efforts should be made to provide the consumer's preferred modality as quickly as possible. We also recommend aligning the consumer choice section with Americans with Disabilities Act requirements.</p>

"UMMS provides primary, urgent, emergency and specialty care at 12 hospitals and more than 150 medical facilities across the state. The UMMS network includes academic, community and specialty hospitals that together provide 25% of all hospital-based care in Maryland. Our acute care and specialty hospitals are located in 13 counties and Baltimore City, and serve urban, suburban and rural communities.

After reviewing the draft regulations, the medical system is concerned that the proposed licensing structure may inadvertently limit access to qualified interpreter services for deaf and hard of hearing patients receiving critical and time-sensitive care. In order to strengthen the proposed regulations and ensure that all Marylanders obtain high-quality and timely health care services, UMMS respectfully requests that you consider the comments and proposed amendments outlined below.

1. COMAR 14.41.01.08 Consumer Choice.

This regulation would require interpreters and agencies to provide sign language interpreting services via VRI or on-site, in-person interpreting "according to the preference of the consumer." While consumer choice may be an appropriate option in many settings, it is not practical in hospitals, emergency departments, or other healthcare facilities that provide emergency medical care. First, there are simply not enough certified interpreters in Maryland to meet the sizable demand for interpretive services in the healthcare sector. As of this writing, the State of Maryland has fewer than 500 certified ASL interpreters. In contrast, the University of Maryland Medical Center in Baltimore City – one of 12 UMMS hospitals – received more than 5,300 ASL requests in Fiscal Year 2024 (July 1, 2023– June 30, 2024). Across all UMMS hospitals, the number of ASL requests in FY2024 exceeded 10,000. Second, on-site, in-person interpreting is not feasible in many rural communities served by UMMS facilities. As ODHHH and SSBLI are aware, interpreter services are not evenly distributed across the State and requiring in-person services in parts of Southern Maryland, Western Maryland, and the Eastern Shore will delay or prevent timely care.

Regulation .08D expressly recognizes that it may be inappropriate to require on-site, in-person interpreting services in all circumstances by allowing VRI interpreting services "in the case of an emergency" for up to "sixty (60) minutes." However, the regulations do not (1) define "emergency" or (2) specify whether "sixty (60) minutes" means the total amount of VRI that may be provided in an emergency before in-person interpreting is required or a deadline by which in-person interpreting services must be provided. If the latter, it creates a completely unworkable standard as it can take up to 12 hours to contact an agency and secure an on-site, in-person interpreter; particularly in rural areas.

To clarify the scope of the regulations and ensure that medical providers may provide necessary and timely care, UMMS recommends the below changes to Regulation .08.

.08 Consumer Choice.

A. Except as provided in §D, interpreters and agencies shall provide sign language interpreting services via VRI or on-site, in-person interpreting according to the preference of the consumer.

B. Prior to accepting a request for services, interpreters and agencies must ask the requester of the services whether the consumer prefers VRI or on-site, in-person interpreting.

C. If the requester is requesting one type of service and the consumer prefers the other type, the interpreter or agency shall not provide sign language interpreting services.

D. Exceptions

(1) In the case of an emergency, interpreters and agencies may provide sign language interpreting services via VRI for up to sixty (60) minutes.

(2) A healthcare facility, as defined in 19-114 of the Health – General Article, Annotated Code of Maryland, is not subject to this regulation."

	<p>2. Request for clarity on the law it states “Allow Deaf and Hard of Hearing individuals to determine whether they prefer sign language interpretation services being provided in a video remote interpreting setting or through in person interpreting;”</p> <p>a. If the meaning of the law is that it guarantees the right to express a preference it does not necessarily guarantee the right to receive services in the preferred mode. So now if the SBSLI writes regulations that require that the service be provided in the preferred mode (in-person vs. VRI) that could be challenged as exceeding the authority granted by the statute.</p>
	<p>3. Request for clarification of what constitutes an “emergency” under Regulations. 08 Consumer Choice section D – Suggested consult with their legal counsel</p> <p>a. This is unclear what would constitute an emergency (flat tire, medical emergency, etc.)</p> <p>4. How will the board enforce compliance if the law states Deaf and Hard of Hearing individuals must receive their preference?</p> <p>a. Is the expectation that they will need to file a complaint similar to the ADA?</p> <p>b. Follow up - are there exceptions to the rule?</p> <p>i. What if an interpreter gets a flat tire on the way to an appointment? Is the requestor now outside of compliance?</p> <p>ii. What if a reasonable effort was made to meet the preference of the consumer, but no interpreter was available?</p> <p>5. How will the board identify these requestors that refuse to provide in-person interpreters vs. a requestor that has made a good faith effort, but was unable to meet the preference of the consumer?</p> <p>6. Request to add language that stresses: Effective Communication, Undue Hardship, Reasonable effort, etc.</p> <p>a. Concerned that 99% compliant organizations may be targeted for the 1%</p> <p>7. If the Laws and Regulations don’t have enforcement, we will be in the same boat as we are with the Americans with Disabilities Act</p> <p>a. Too much effort to file a complaint/lawsuit</p> <p>8. The current regulations in the MD Register put the ownership on Agency and Interpreters rather than the historically noncompliant Businesses or Organizations (Requestors)</p> <p>9. The availability of qualified interpreters will be strained when</p> <p>a. Licensure comes online</p> <p>b. Further stressed if customer preference is a requirement</p> <p>c. Specialization narrows the availability of qualified interpreters further</p> <p>10. Organizations may be more vulnerable to litigation even when attempting to provide the best and most appropriate services if at any point they were unable to meet the interpreting preference of the D/HoH individuals</p> <p>11. Let’s establish a strong and qualified work force and then tackle non-compliance with the ADA and other applicable laws in a different bill. I am onboard in being a supportive partner in current and future efforts.”</p>

	<p>Regarding Section 8(D), the allowance of VRI for only sixty (60) minutes in emergency situations may be insufficient, especially in rural areas where it can take significantly longer to arrange for a live interpreter to arrive. Limiting virtual services to this timeframe risks cutting off communication before effective onsite coverage is available. For emergency services, allow the Deaf consumer to consent to continued VRI beyond sixty minutes while best efforts continue to secure an onsite interpreter.</p> <p>This approach respects the consumer's autonomy while acknowledging real-world limitations on interpreter availability and ensures Deaf individuals are not left without access, particularly in urgent or rural situations.</p>
	<p>While respecting the preferences of Deaf consumers is essential, the current language in Section 8(C) creates a situation where no services are provided if the requester and the Deaf consumer disagree on the mode of interpreting service. If no services are provided until a resolution is reached, Deaf people will frequently be left without interpretation—effectively denying access.</p> <p>I urge the Board to revise these sections to:</p> <p>Ensure good faith efforts are made to accommodate the Deaf consumer's preference.</p> <p>If no suitable onsite interpreter can be found, the Deaf consumer should be offered the option to accept virtual interpreting services, rather than denied services.</p>
	<p>While respecting the preferences of Deaf consumers is essential, the current language in Section 8(C) creates a situation where no services are provided if the requester and the Deaf consumer disagree on the mode of interpreting service. If no services are provided until a resolution is reached, Deaf people will frequently be left without interpretation—effectively denying access.</p> <p>I urge the Board to revise these sections to:</p> <p>Ensure good faith efforts are made to accommodate the Deaf consumer's preference.</p> <p>If no suitable onsite interpreter can be found, the Deaf consumer should be offered the option to accept virtual interpreting services, rather than denied services.</p>

Regulations	Concerns/Comments
	<p>The cost for licensure is too high. A teacher license in the state of MD costs only \$10 in comparison. Additionally, educational interpreters are negatively impacted because they likely need both a provisional education and general license to continue working at all their current assignments (classroom, school plays, graduations, parent/teacher conferences). Currently we do not have enough educational interpreters to meet the demand as it is. These fees will discourage others from working in K-12. They are paid far less on average while serving the highest need population. An interpreter who needs both license types will have to pay at least \$300-\$450 on top of RID dues (between \$175 and \$220). None of these fees are being reimbursed to staff interpreters in my school district.</p>
<p>.09 Application. A. An applicant shall: (1) Submit a completed application form, supplied by the Office; (2) Provide identification which shall include a valid: (a) Driver's license; (b) State-Issued identification; or (c) Passport; (3) Submit a 2x2 inch (passport-sized) photo of the applicant; (4) Submit documentation that the applicant has met: (a) Any required certifications; (b) Any required education qualifications; (c) Any required experience qualifications; and (d) Any required continuing education hours; and (5) Submit payment for any required fees.</p>	<p>B. Fees Staff educational interpreters (classroom interpreters) are not paid like freelance or agency interpreters. Nor are they paid like classroom teachers. MD Licensed Educators pay \$10.00 (ten dollars) every five (5) years for their fees.</p>
	<p>We request an adjustment of the fees. Interpreters now have to be certified, licensed, they pay for CEUs, most don't get benefits, the multiple extra expenses that are adding up are bound to create undue hardship and price interpreters out of the field or force them to move to the city, which only harms the rural areas further. Rural locations are already a hard sell for interpreters as the work is less and the pay isn't as competitive as in big cities. Please understand that the extra fees will scare new interpreters out of the field, and price out anyone who's part time, and some parts in Maryland truly depend on those part time interpreters. Cut the fee in half, don't charge for specialty licenses, keep the fee the same but charge it every two years, lower the rate for rural areas, give new interpreters who are just starting and those who are very part time a reduced price. If we can get a lower rate on car insurance for driving less than average, why not a reduced rate for interpreting less than average? There are several options, please just consider how much this will all cost interpreters in the end and how it will drive people out of the field, which is the last thing we want.</p>
<p>Comment on Section 9(B) of the Proposed Regulations: Licensing Fees Section 9(B) outlines the initial and annual licensing fees for sign language interpreters: "\$150 for an initial license and \$100 annually for renewal."</p>	<p>Many interpreters believe these fees are excessive, especially considering that additional specialty area licenses are anticipated in the future, each expected to carry its own cost and maintenance requirements. I recommend that the licensing fees in Section 9(B) be reduced by at least 50%. A \$75 initial fee and a \$50 annual renewal would strike a more reasonable balance that will diminish disincentive for interpreters to participate in the licensure system. This adjustment would help maintain interpreter availability and affordability while still upholding regulatory goals.</p>

<p>Comment on Section 9(B) of the Proposed Regulations: Licensing Fees Section 9(B) outlines the initial and annual licensing fees for sign language interpreters: "\$150 for an initial license and \$100 annually for renewal."</p>	<p>Concern: Many interpreters believe these fees are excessive, especially considering that additional specialty area licenses are anticipated in the future, each expected to carry its own cost and maintenance requirements.</p> <p>Suggested Revision: I recommend that the licensing fees in Section 9(B) be reduced by at least 50%. A \$75 initial fee and a \$50 annual renewal would strike a more reasonable balance that will diminish disincentive for interpreters to participate in the licensure system. This adjustment would help maintain interpreter availability and affordability while still upholding regulatory goals.</p>
	<p>3) Fees-too excessive (will see interpreters walking away and leaving job) try for at least every 2 or 4 years to pay fees like driving license!!</p>
	<p>Many interpreters believe these fees are excessive, especially considering that additional specialty area licenses are anticipated in the future, each expected to carry its own cost and maintenance requirements. I recommend that the licensing fees in Section 9(B) be reduced by at least 50%. A \$75 initial fee and a \$50 annual renewal would strike a more reasonable balance that will diminish disincentive for interpreters to participate in the licensure system. This adjustment would help maintain interpreter availability and affordability while still upholding regulatory goals.</p>
	<p>Cost Burden and Financial Strain While we recognize the value of standardization, the associated compliance costs - application fees, continuing education, supervision requirements, and administrative burdens - will likely result in higher interpreter rates. In an already strained environment, where many agencies operate on tight margins and many providers (especially small medical or legal offices) already hesitate to pay for mandated services, this could reduce availability and access for the very communities these regulations are meant to serve.</p> <p>Although the federal Disabled Access Credit (IRS Form 8826) provides up to \$5,000 in relief to eligible small businesses, awareness of this incentive is low, and many providers do not qualify. We urge the State to:</p> <p>Launch a public awareness campaign about this federal tax credit,</p> <p>Consider state-level grants or subsidies for providers incurring increased costs due to interpreter licensing,</p> <p>Offer reduced or waived fees for interpreters working in high-need or rural areas, including Frederick County.</p>
<p>Section 9(B) outlines the initial and annual licensing fees for sign language interpreters: "\$150 for an initial license and \$100 annually for renewal."</p>	<p>Concern: Many interpreters believe these fees are excessive. It is important to keep in mind the additional fees, for specialty licenses, that are expected in the future.</p> <p>Suggested Revision: I recommend making licensure more affordable by reducing the licensing fees in Section 9(B) by at least 50%. An initial fee of \$75 and an annual renewal fee of \$50 would be less likely to discourage interpreters from living and working here.</p>

<p>B . Fees.</p> <p>(1) All fees are paid annually unless specified otherwise and are nonrefundable. The fees are as follows:</p> <p>(a) Initial application for general community non-provisional license—\$150;</p> <p>(b) Initial 3-year provisional license—\$300;</p> <p>(c) Renewal application for general community non-provisional license—\$100;</p> <p>(d) Provisional 2-year license renewal for general community or education specialty—\$150;</p> <p>(e) Reactivation fee—\$150;</p> <p>(f) Initial agency application—\$250;</p> <p>(g) Agency renewals—\$200; and</p> <p>(h) Late renewal application (31 or more days after renewal date)—\$75.</p>	<p>I find the fees for licensure to be too high. The interpreting profession is not one that has seen steady pay increases throughout the years, yet the rise of the cost of living, operational costs of doing business, RID dues, etc are constantly going up. Now, we have licensure fees to cover. I would like to see a reduction of the fees to \$100 for initial application for the generalist license, and \$50 for renewal.</p>
	<p>The cost of the license is too expensive and can add more pressure to marginalized interpreters and new interpreters struggling to get certified or maintain certification. We already pay for CEUs and annual certification to RID.</p>
	<p>1. COSTS:</p> <p>It seems that the proposed fee structure includes a one time \$150 fee for the general license, followed by a \$100 annual renewal fee. Additionally, an educational license requires a separate \$150 fee, which is expected to be renewed every two years. This results in initial cost of \$300 with reoccurring cost of \$250 every two years, plus an additional \$100 in the alternate years for the general license renewal.</p> <p>These costs are significantly higher than the licensing or registration fees required for many other professions regulated by the Department of Labor. This raises legitimate concerns about the financial burden placed on interpreters, particularly those serving in under-resourced settings, like educational, where interpreter shortages are already a challenge.</p>
	<p>We request an adjustment of the fees. Interpreters now have to be certified, licensed, they pay for CEUs, most don't get benefits, the multiple extra expenses that are adding up are bound to create undue hardship and price interpreters out of the field or force them to move to the city, which only harms the rural areas further. Rural locations are already a hard sell for interpreters as the work is less and the pay isn't as competitive as in big cities. Please understand that the extra fees will scare new interpreters out of the field, and price out anyone who's part time, and some parts in Maryland truly depend on those part time interpreters. Cut the fee in half, don't charge for specialty licenses, keep the fee the same but charge it every two years, lower the rate for rural areas, give new interpreters who are just starting and those who are very part time a reduced price. If we can get a lower rate on car insurance for driving less than average, why not a reduced rate for interpreting less than average? There are several options, please just consider how much this will all cost interpreters in the end and how it will drive people out of the field, which is the last thing we want.</p>
	<p>High fees disproportionately affect interpreters at the beginning of their careers (double than certified interpreters), and independent contractors without institutional financial support.</p> <p>These costs are often passed on to clients and contracting agencies, increasing service rates and reducing accessibility for the communities served.</p>
	<p>These Fees are ridiculous and excessively expensive especially for interpreters outside the City limits such as Western Maryland and Eastern Shore.</p>

	<p>These Fees are ridiculous and excessively expensive especially for interpreters outside the City limits such as Western Maryland and Eastern Shore.</p>
	<p>I am writing to comment on the proposed regulations under COMAR 14.48.01, which raises several concerns when it comes to the interpreting community. I personally believe that passing this through will create entry barriers when help is already short and hard to find. The fees associated with licensing will become a burden, specifically for early-career professionals already starting well behind when they enter the workforce. Imposing this regulation risks excluding interpreters from underserved communities and marginalizing the Deaf and Blind modalities. Perhaps the most important piece to be considered is that there is no way for consumers to waive certification requirements which undermines ADA compliance.</p> <p>In place of this regulation, perhaps consider, introducing a Maryland-based credentialing alternative. This will help to broaden qualification pathways. Maybe look to define specialty areas or remove unnecessary designations, while reducing the licensing fees to align with other professions that require licensing and continued training.</p>
	<p>I would like to express concern about the cost structure for provisional licenses outlined in the proposed regulations (COMAR 14.41.01.09). I understand that the \$300 fee covers a 3-year provisional license, while the standard license is \$150 per year, making the provisional license more cost-effective over time. However, the upfront cost of \$300 may still present a significant financial barrier for new interpreters, many of whom are recent graduates or early-career professionals who may not yet have consistent income or agency contracts. I encourage the Board to consider offering a more flexible payment option—such as annual payments—or reducing the initial fee to support access to licensure and career entry for emerging professionals.</p>
<p>Comment on Section 9(B) of the Proposed Regulations: Licensing Fees Section 9(B) outlines the initial and annual licensing fees for sign language interpreters: "\$150 for an initial license and \$100 annually for renewal."</p>	<p>Many interpreters believe these fees are excessive, especially considering that additional specialty area licenses are anticipated in the future, each expected to carry its own cost and maintenance requirements. I recommend that the licensing fees in Section 9(B) be reduced by at least 50%. A \$75 initial fee and a \$50 annual renewal would strike a more reasonable balance that will diminish disincentive for interpreters to participate in the licensure system. This adjustment would help maintain interpreter availability and affordability while still upholding regulatory goals.</p>
	<p>My issue is that this is placing undue financial burden on freelance interpreters. We already maintain RID or NAD certification dues and now there will be application and licensing fees. For what? To increase revenue for the state? How is that fair? I see no direct positive impact. It's punishing interpreters for being certified. What exactly is it regulating? Agencies vet their interpreters through screening and proper credentials already. Please stop this from going through</p>

	<p>I think there should be a different cost for agencies that are LLCs with a single person such as myself as compared to an agency that has many more 1099 employees. This is terrible to make both costs the same-deductible off of state/federal taxes or not. My LLC is sole propietership and I work as an interpreter part time. So that means \$350 the first year? and what \$300 annually after that. Why?</p> <p>And why is the fee so high for certified interpreters? I pay \$220 for RID. Then \$150 for MD plus \$350 for part-time engagement as a sole propieter business owner. What does the committee believe this will do to SMALL business owners and especially minority ones like myself? There is a huge difference in the Sorenson community interpreters agency paying \$200 and me paying \$200. Make it make sense.</p> <p>Literally, the board is ONLY verifying my RID certification that costs \$220 and is ONLY verified by an online one button process using Credly. Is that one button press worth \$150 annually? Show the cost breakdowns of an automated system check that takes nanoseconds.</p>
	<p>-This additional to national credentialing fees. This could create a serious financial burden, or deter those away that do not find the fees achievable. This also creates are larger shortage. I substitute for this could be reduce fees at least 50%. Annual fees for those with multiple licenses should have a reduced-combined fee, rather than multiple high fees.</p> <p>- Also, an explanation on how the finances benefit the DHOH communities would be appreciated.</p>

My main concerns and objections to the Maryland Interpreter Licensure are: the current language does not include RID certification (CI/CT/NIC) as an acceptable credential to work as an educational interpreter in the state of Maryland and the prohibitive cost of the \$300 provisional licensure fee.

RID recently advertised a workshop entitled, "Educational Interpreting in the Time of Language Deprivation." Clearly this licensure law compounds the issue of language deprivation for Deaf people. There is already a shortage of educational interpreters, and by not allowing interpreters with RID certification who are currently working in education to continue to practice, this problem will become worse.

I know of two very experienced RID certified interpreters who currently work in education who are considering leaving the professional because of the the Maryland Interpreter Licensure. One colleague has been RID certified for 20+ years, and has worked in educational interpreting longer than 20 years. She could retire, but continues to work because of her love for students and her job. She told me that if this law does not allow RID certified interpreters to work in schools, she will retire. There is one less skilled interpreter available for the Deaf community. My other colleague has held RID certification for 10+ years. She is one of the best interpreters I know. She has decided to let her certification lapse (if RID certification won't be accepted for interpreters working in schools) because of the "constant reminder that I will always be the enemy who has to prove I'm not taking advantage of and victimizing and culturally oppressing when in reality all I wanted to do was to support a community I cared about." She has decided that after paying for her national certification that she can't even use in the state of MD anymore, the licensure fee, plus testing fees, plus paying for CEUs, she will leave the field of interpreting and do something different. What a waste, and what a loss.

The economic impact of a \$300 licensure fee for educational interpreters who are already the lowest paid of all types of interpreters needs to be reconsidered. This Interpreter Licensure wants us to pay \$300 for the provisional license. The SBSLI needs to do more research about what interpreters working in schools are being paid. They also need to research what other state licensure fees are. I also hold a Maryland Teaching Certificate. It costs \$10 to renew it for 5 years! A cosmetologist pays \$50/year for a license to work in the state of Maryland. Where did this \$300 amount come from, what will this money be used for, and how are educational interpreters supposed to afford this?

It seems to me that the Maryland Interpreter Licensure, while having good intentions, is hurting more people than it will help. It will also take away interpreters from Maryland public schools and will cause more language deprivation! Please start considering the comments of your constituents. Up to this point, we have been saying the same things over and over again, and our petitions have fallen on deaf ears (pun intended).

	<p>4. Excessive and Burdensome Licensing Fees The newly imposed fees are excessive and present a significant financial burden on interpreters and agencies. Examples include:</p> <p>\$150 for an initial general license</p> <p>\$300 for a 3-year provisional license</p> <p>\$250 for an initial agency application</p> <p>\$200 for agency renewal</p> <p>\$150 for license reactivation</p> <p>These fees were not previously required and now place an undue financial strain on professionals who are already grappling with restrictive policies and unclear expectations. It appears that the focus has shifted from improving access to increasing revenue—at the expense of both interpreters and the Deaf and Hard of Hearing community.</p>
	<p>I am a transplant interpreter who came to the DMV from Maryland almost 20 years ago. When I arrived, I held State of Utah certification but otherwise I was seen as an uncertified interpreter in the area, making a lower wage but trying to get more experience until I passed the NIC test and became Nationally Certified. In Utah at this time, it costs \$50 a year for an RID certification to be recognized and State Certification costs \$75 per year.</p> <p>I am opposed to licensure in the state of Maryland for several reasons:</p> <ol style="list-style-type: none"> 1. it places an undue financial burden on certified interpreters of \$150 a year on top of our expensive \$220 a year RID renewal fees. Maryland has run without this addition funding in their coffers up until this point and I see no additional benefit from the interpreters point of view to pay this amount. 2. It makes it extra difficult for new interpreters to enter the field. Provisional licenses are \$300 and those interpreters are making a lower wage, saving up for the expensive certification exams, and have fewer job options in the first place so this is an undue hardship. 3. Specialty licenses. I happen to know several very skilled interpreters who have been working in the k-12 arena who are currently uncertified. I would trust them over some of my certified interpreters. They are working towards certification obtaining the necessary college degree to get there but do excellent work. <p>I feel that having an additional license requirement and burden placed on interpreters is harmful for those entering the field, places an undue financial burden on those certified and already working, and places unfortunate and harmful limitations on interpreters that could potentially lower the availability of interpreters to deaf consumers that otherwise would be fit for the job at hand. I am grateful I was able to work in the DMV to hone my skills and gain experiences to better serve deaf clients. I hope that opportunity continues available for those coming behind me. Thank you!</p>

<p>B . Fees.</p> <p>(1) All fees are paid annually unless specified otherwise and are nonrefundable. The fees are as follows:</p> <p>(a) Initial application for general community non-provisional license—\$150;</p> <p>(b) Initial 3-year provisional license—\$300;</p> <p>(c) Renewal application for general community non-provisional license—\$100;</p> <p>(d) Provisional 2-year license renewal for general community or education specialty—\$150;</p> <p>(e) Reactivation fee—\$150;</p> <p>(f) Initial agency application—\$250;</p> <p>(g) Agency renewals—\$200; and</p> <p>(h) Late renewal application (31 or more days after renewal date)—\$75.</p>	<p>Section 9(B): Licensing Fees, would it be possible to have the fee's be \$75 and annually \$25? Maintaining RID certification cost over \$200 yearly. By having another \$100 or \$150 and a separate fee, this is going to cause many interpreters to hike their rates. Hiking rates, will require agencies to also do the same, which will lead to many offices not being able to afford interpreting services. This will be a huge impact on the community when they cannot get services due to "it costing too much".</p>
	<p>I find these fees are excessive, especially considering that additional specialty area licenses are anticipated in the future, each expected to carry its own cost and maintenance requirements. Additionally, as the specialty licenses may require additional specialty CEUs, this cost quickly becomes prohibitive. As such, my concern is that despite being qualified to provide interpreting service in a given specialty, interpreters will self-select out of obtaining specialty licenses, as they may think they don't work in a given specialty enough annually to justify the license cost. I recommend that the licensing fees in Section 9(B) be reduced by at least 50%. A \$75 initial fee and a \$50 annual renewal would strike a more reasonable balance. I think the specialty licenses should have a much smaller additional charge as well. Many freelance interpreters work in a variety of settings, and would need to spend a significant amount of money just to obtain the various licenses required for the nature of their freelance work. This adjustment would help maintain interpreter availability and affordability while still upholding regulatory goals.</p>
	<p>Many interpreters believe these fees are excessive, especially considering that additional specialty area licenses are anticipated in the future, each expected to carry its own cost and maintenance requirements. In the education field (MD), Teacher licensing fees are significantly less than this in comparison. These fees along with the specialty fees are cost prohibitive to many interpreters. I think that the licensing fees outlined in Section 9(B) should be reduced by at least 50%. Something like a \$75 initial application fee and a \$50 renewal (not annually)—would represent a more reasonable and accessible cost. This adjustment would help reduce financial barriers that may discourage interpreters from entering or remaining in the licensure system. Lowering the fees in this way supports broader participation, which is essential for maintaining both interpreter availability and service affordability.</p>

Regulations	Concerns/Comments
<p>.10 Approval.</p> <p>A. Upon receiving a completed application under Regulation .09 of this chapter and all documentation required by law or regulation, the Office shall determine compliance with the requirements of this chapter by evaluating the application and required documentation.</p>	
<p>B. The Office, within 30 working days after receipt of a full application including all required documentation, shall:</p> <p>(1) Approve or deny the application; and</p> <p>(2) Upon approval of an application, ask the Board to issue the interpreter a license authorizing the applicant to provide sign language interpreting services in accordance with the regulations in this chapter.</p>	<p>30 days is way too long for it to take to approve an Interpreter</p>
	<p>14.41.10 B: Thirty working days (the equivalent of six weeks calendar weeks) is the timeframe for the Office to determine whether an application is approved or denied, at which point the process moves to the Board to issue the license. What is the time-frame for the Board's role of following through with the issuance of the license or denial by certified mail? We hope that licenses will be available electronically so as to not hold up the process to ensure all consumers have services.</p> <p>14.41.10 B (2): In the event there is a delay in the Board's process of issuing a license upon receipt of the approval from the Office, will there be a mechanism for an interpreter or an agency to verify the approval in order to accept or assign interpreting work in compliance with these regulations? Again – an electronic listing of licensed interpreters?</p>
<p>C. Except with the approval of the Board, an applicant may not withdraw an application while under investigation or having received a notice of denial of licensure.</p>	
<p><i>D. If the Office denies an application, the Office shall notify the applicant in writing by certified mail of the denial, stating the:</i></p> <p><i>(1) Reason for the denial;</i></p> <p><i>(2) Specific regulation with which the applicant has failed to comply that is the basis for the denial;</i></p> <p><i>(3) Applicant's right to request a hearing; and</i></p> <p><i>(4) Procedure to be used if the applicant wishes to request a hearing to appeal the decision of the Office.</i></p>	
<p>E. A hearing on the denial of an application shall be conducted in accordance with Regulation .12 of this chapter.</p>	

Regulations	Concerns/Comments
<p>.11 Suspension, Revocation, and Fines.</p> <p>A. If a licensee or applicant violates any provision in State Government Article, §9-2426, Annotated Code of Maryland, or any provision of §B of this regulation, the Board may initiate disciplinary proceedings to:</p> <p>(1) Deny a license to any applicant;</p> <p>(2) Reprimand any licensee;</p> <p>(3) Suspend a license;</p> <p>(4) Summarily suspend a license;</p> <p>(4) Revoke a license;</p> <p>(5) Require a licensee to attend an educational course or training;</p> <p>(6) Impose a fine not to exceed \$500.00 for each violation; or</p> <p>(7) Use a restorative justice program in lieu of taking final action on a complaint.</p>	<p>The Board is not a state education agency (SEA) like the Maryland State Department of Education</p> <p>The members of the Board are not licensed educators or related service providers, not vetted (fingerprinted), or ethical to work with K12 students who are minors.</p> <p>The Board does not have the credentials needed to have the authority over any personnel processes including disciplinary proceedings over personnel who work in LEAs, only LEAs have the authority.</p> <p>"complaints" - K12 students who are minors cannot be "complaints".</p> <p>K12 students who use ASL/sign language as their primary communication mode are entitled to language and communication access as required by IDEA, 504, and ADA. This section will create communication barriers for K12 students and that is illegal.</p>
<p>C. The Board shall commence disciplinary proceedings under this regulation upon receipt of a complaint submitted to the Board against an applicant or licensee if:</p> <p>(1) The complaint is made by a person other than a member of the Board;</p> <p>(2) The complaint is made under oath by the person who submits the complaint;</p> <p>(3) The complaint states specifically the facts on which the complaint is based;</p> <p>(4) The Board will conduct a meeting with all involved parties to collect evidence; and</p> <p>(5) The Board finds that a complaint alleges facts that are adequate grounds for action under State Government Article, §9-2426, Annotated Code of Maryland and this regulation.</p>	<p>Section 11(C)(4) states that:</p> <p>"The Board shall hold a meeting with the involved parties..."</p> <p>Concern:</p> <p>The regulation does not specify a time frame for when this meeting must take place. Without a clearly defined deadline, complainants and licensees alike may experience prolonged uncertainty or delays, undermining confidence in the fairness and efficiency of the process.</p> <p>To ensure transparency, accountability, and timely resolution of complaints, I recommend that the regulations be revised to include formal, clearly defined time frames. For example:</p> <p>The meeting referenced in Section 11(C)(4) should be held within 30 calendar days of notifying the involved parties.</p>
	<p>The regulation does not specify a time frame for when this meeting must take place. Without a clearly defined deadline, complainants and licensees alike may experience prolonged uncertainty or delays, undermining confidence in the fairness and efficiency of the process.</p>
<p>F. During the suspension or revocation period of a license, the licensee shall not engage in any interpreting work.</p>	<p>If this is to stay in the Regs, then there needs to be a time limit for processing the complaints. There cannot be an indefinite amount of time an interpreter is expected to not work/ have income while waiting for restorative justice or an investigation</p>
	<p>The regulation does not specify a time frame for when this meeting must take place. Without a clearly defined deadline, complainants and licensees alike may experience prolonged uncertainty or delays, undermining confidence in the fairness and efficiency of the process.</p>
	<p>ALJ HEARING(S):</p> <p>I don't love the fact that if one requests an ALJ hearing, the Board is who will make the decision, it's almost as though the ALJ is acting more as a consultant. This does not protect either party from a non-biased Board (to my knowledge, we don't even have a PCRID rep on the Board; that seat is vacant). Additionally, knowing how under-supported and under-resourced the Board has been through throughout this entire process, I question their ability to meet self imposed deadlines, or to be able to handle complaints in a timely fashion. I foresee significant backlogs, and I believe that this will ultimately hurt the practitioners and the consumers. I plan to encourage that some of Board's authority be dispersed to those who are trained to review such cases (DLLR, ALJ) to help mitigate this. I'm just not sure how to word it. (Ideally, I wish the entire license was actually housed under DLLR and not GODHH, but it might be too late for that.)</p> <p>To ensure transparency, accountability, and timely resolution of complaints, I recommend that the regulations be revised to include formal, clearly defined time frames.</p> <p>For example: The meeting referenced in Section 11(C)(4) should be held within 30 calendar days of notifying the involved parties.</p>

<p>B. The actions listed in §A of this regulation may be imposed if an applicant or a licensee:</p> <p>(1) Fraudulently or deceptively obtains or attempts to obtain a license for the applicant, licensee, or another individual;</p> <p>(2) Fraudulently or deceptively uses a license;</p> <p>(3) Provides sign language interpretation services after the expiration of a license or outside the scope of the license;</p> <p>(4) Is deemed legally incompetent to provide sign language services;</p> <p>(5) Engages in dishonest, unethical, immoral, or unprofessional conduct as defined in the RID-NAD Code of Professional Conduct or its successor;</p> <p>(6) Uses alcohol or drugs before or during a sign language interpreting assignment, to the extent of being unfit to provide sign language interpretation services;</p> <p>(7) Is the subject of disciplinary or other administrative action taken against the individual's certification or license to provide sign language interpretation services in another state; or</p> <p>(8) Violates any provision of the State Government Article, §§9-2410—9-2435, Annotated Code of Maryland, or any regulation in this chapter.</p>	<p>5. Overlap in Disqualifying Conduct (§.11(B)(1)–(8)) Creates Redundancy and Inefficiency COMAR §14.48.01.11(B) outlines disqualifying conduct for licensed interpreters, including fraud, professional incompetence, ethical violations, and other forms of misconduct. While protecting consumers and maintaining high professional standards is essential, it is important to note that these very forms of misconduct are already actively monitored and sanctioned by the two national credentialing bodies recognized in Maryland: the Registry of Interpreters for the Deaf (RID) and the Board for Evaluation of Interpreters (BEI).</p> <p>Both RID and BEI maintain formal, peer-reviewed disciplinary mechanisms that are aligned with established ethical codes and grounded in decades of profession-specific governance. These systems are designed to investigate complaints, determine appropriate sanctions, and—crucially—uphold due process while reflecting the unique linguistic and cultural complexities of interpreting practice. By integrating Maryland's disciplinary framework with existing national systems, the state can maintain accountability and public protection while avoiding waste, preserving fairness, and supporting interpreter workforce sustainability.</p> <p>Specifically, the following categories listed under COMAR §.11(B) are already subject to enforcement through RID's Ethical Practices System (EPS) and BEI's professional conduct procedures:</p> <p>Fraudulent Licensure or Misrepresentation: RID and BEI both reserve the right to deny, suspend, or revoke certification based on false documentation or intentional misrepresentation during the credentialing process.</p> <p>Practicing Without a Valid License or Beyond Scope: RID requires maintenance of certification through CEUs and adherence to scope-of-practice expectations; BEI has similar continuing competency and scope enforcement provisions.</p> <p>Legal Incompetence or Professional Incapacity: Both national bodies may remove certification from individuals who are no longer capable of practicing safely or professionally due to health, behavioral, or legal incapacity.</p> <p>Unethical or Unprofessional Conduct: RID's CPC outlines specific behaviors deemed unethical, such as breaches of confidentiality, dual roles, or exploitation of consumers, and provides a peer-review process for adjudicating violations.</p> <p>Substance Abuse Affecting Performance: RID and BEI allow for temporary or permanent revocation of credentials if the interpreter is found to be under the influence or otherwise unable to perform due to substance misuse.</p> <p>Disciplinary Action in Another Jurisdiction: Both credentialing bodies honor reciprocal enforcement, meaning interpreters disciplined in one state or system may be barred from practice elsewhere.</p> <p>Violation of State or Federal Law (Md. Code §§9-2410–9-2435): While RID and BEI do not prosecute legal violations, both require interpreters to adhere to the law as part of ethical practice. A legal conviction may result in separate professional consequences at the national level.</p> <p>Why a Parallel Disciplinary System is Problematic: While accountability is critical, Maryland's creation of a redundant, state-run disciplinary structure introduces several challenges that ultimately undermine efficiency and consumer protection:</p> <p>Unnecessary Redundancy: The conduct outlined in §.11(B) is already enforceable under national credentialing systems. Creating a second, overlapping process duplicates effort and adds complexity without additional consumer benefit.</p> <p>Taxpayer Cost: Maintaining a parallel investigation and enforcement process would require staffing, legal counsel, case processing, and appeals management. These expenditures may divert limited resources away from more pressing needs, such as interpreter workforce development and community language access programs.</p> <p>Practitioner Confusion and Legal Risk: Interpreters may face simultaneous or conflicting investigations for the same event—one through RID or BEI and one through Maryland's licensing board. This inconsistency could result in contradictory outcomes, erode trust in the regulatory process, and create legal exposure for the state.</p> <p>Chilling Effect on Interpreter Recruitment: A complex and duplicative disciplinary structure may discourage qualified interpreters from entering or remaining in the Maryland workforce—particularly those who already comply with rigorous national standards and who fear excessive or unclear regulatory risk.</p> <p>Recommendations: To streamline enforcement, uphold due process, and ensure efficient governance, I recommend the following actions:</p> <ol style="list-style-type: none"> 1. Avoid Redundancy by Aligning with National Systems: Ensure Maryland's enforcement framework complements, rather than duplicates, existing national credentialing systems, particularly where misconduct is already governed by RID and BEI. 2. Revise or Eliminate §.11(B)(5): Remove or narrow provisions related to general ethical conduct unless they directly pertain to administrative violations unique to state licensure. Instead, defer to national disciplinary systems that are already designed to assess such issues within the context of interpreter practice. 3. Limit State Oversight to Clear Regulatory Violations: Focus the state board's enforcement authority on administrative violations, such as unlicensed practice, fraud in licensure application, or noncompliance with registration and CEU requirements—areas where state interest is clearly distinct from national certifiers. 4. Establish Disciplinary Reciprocity: Automatically recognize disciplinary actions issued by RID and BEI. This would allow the Maryland board to act swiftly when needed, while avoiding duplicative procedures. 5. Reinvest Savings in Workforce and Access Initiatives: Use administrative cost savings to support rural interpreter recruitment, professional development scholarships, consumer outreach, and improvement of public interpreting access.
--	---

	<p>Section 11(C)(4) states that: "The Board shall hold a meeting with the involved parties..."</p> <p>Concern: The regulation does not specify a time frame for when this meeting must take place. Without a clearly defined deadline, complainants and licensees alike may experience prolonged uncertainty or delays, undermining confidence in the fairness and efficiency of the process. To ensure transparency, accountability, and timely resolution of complaints, I recommend that the regulations be revised to include formal, clearly defined time frames. For example: The meeting referenced in Section 11(C)(4) should be held within 30 calendar days of notifying the involved parties.</p>
	<p>License Suspension Procedures The proposed three-month suspension during the investigation of a potential violation—regardless of outcome—raises significant due process concerns. Preventing an interpreter from working during this time, especially when allegations may be unfounded or minor, poses undue hardship. The lack of clarity surrounding the investigative process only adds to the anxiety and uncertainty for professionals whose livelihoods and reputations are on the line.</p>
G. During the revocation period of a license, the licensee may not reapply for licensure for a minimum of 3 months, which will include the investigation period. The final length of the revocation period will be determined by the Board.	<p>If a violation occurs, interpreters may face a 3-month suspension period during the investigation, during which they are not allowed to work, followed by a new license application. -The process lacks transparency and could lead to unintended harm for both interpreters and Deaf consumers.</p>
	<p>14.41.11 B (5): We assume the definition of "dishonest, unethical, immoral, or unprofessional conduct" is related to what is outline in the RID-NAD Code of Professional Conduct. Please clarify in the regs.</p>
14.41.11 F and 14.41.12 A (5): 14.14.11 F	<p>Provides that during a license suspension or revocation period, the licensee shall not engage in any interpreting work. However 14.41.12 A (5) offers the option for the Board to decide whether the licensee may continue to provide sign language services during the penalty period. Please make them consistent, and we recommend the approach in 14.41.12 A (5).</p>
	<p>.11(B)(3) states that providing interpreting outside the scope of a license is a disciplinary offense, which is inconsistent with .04 (D)(3).</p> <p>A freelance interpreter who worked under the 80-hour exemption to provide urgent mental health services could later face fines or license suspension if record keeping requirements were misunderstood—even if the services were legally permissible.</p> <p>I recommend clarifying that agencies and interpreters will not be penalized when acting in good faith and documenting their compliance.</p>
	<p>Section 11(C)(4) states that: "The Board shall hold a meeting with the involved parties..."</p> <p>Concern: The regulation does not specify a time frame for when this meeting must take place. Without a clearly defined deadline, complainants and licensees alike may experience prolonged uncertainty or delays, undermining confidence in the fairness and efficiency of the process. To ensure transparency, accountability, and timely resolution of complaints, I recommend that the regulations be revised to include formal, clearly defined time frames. For example: The meeting referenced in Section 11(C)(4) should be held within 30 calendar days of notifying the involved parties.</p>
C. The Board shall commence disciplinary proceedings under this regulation upon receipt of a complaint submitted to the Board against an applicant or licensee if:	<p>Section 11C (4) - The board will hold meeting with the involved party. What is the time line? What cautions a suspension and who gets fined? Does the interpreter and agency both get fined or just the interpreter? I believe there should be a short turn around for these suspensions to take place. It is important for all parties to be heard, and for everyones daily livelihood not be impacted for too long.</p>
(4) The Board will conduct a meeting with all involved parties to collect evidence; and	
D. The Board shall consider the severity of the violation and whether the violation constitutes a pattern of improper conduct, prior to imposing any disciplinary action.	
E. If a license is suspended or revoked, the original license shall be surrendered within 5 business days of the Board's decision.	
(1) The license shall be presented in person at the Office; or (2) Mailed to the Office via registered mail within 5 business days of the date of the Board's decision.	
H. An individual who violates the terms of the suspension or disciplinary action may be subject to additional disciplinary action by the Board.	

<p>Comment on Sections 11(C)(4) and 12(A–B) of the Proposed Regulations: Undefined Timelines for Investigations and Referrals</p> <p>Section 11(C)(4) states that:</p> <p>“The Board shall hold a meeting with the involved parties...”</p>	<p>The regulation does not specify a time frame for when this meeting must take place. Without a clearly defined deadline, complainants and licensees alike may experience prolonged uncertainty or delays, undermining confidence in the fairness and efficiency of the process.</p>
<p>.11(B)(3)</p>	<p>imposes penalties for interpreting without a license</p>

Regulations	Concerns/Comments
<p>.12 Due Process and Hearings.</p> <p>A. Prior to imposing any penalty under Regulation .11 of this chapter, the Board shall notify the licensee by certified mail 30 calendar days in advance of the imposition of any such penalty, and the notice shall specify:</p> <p>(1) The Penalty the Board intends to impose;</p> <p>(2) The effective date and period of the penalty;</p> <p>(3) The reason for the penalty;</p> <p>(4) The regulatory violation which is the basis for the penalty;</p> <p>(5) Notification if the licensee may continue to provide sign language services during the penalty period; and</p> <p>(6) Notice that the licensee may request a hearing before the Office of Administrative Hearings.</p>	<p>K12 students who use ASL/sign language as their primary communication mode are entitled to language and communication access as required by IDEA, 504, and ADA. These sections will create language and communication barriers for K12 students and that is illegal.</p>
	<p>What happens if they find out the deaf consumer is lying about the situation? Will that Deaf Client be fined? Who will pay for the lost wages for the interpreter while this process is going on? This law would be harmful to any agency. The law expressly say it requires certification by one of three bodies and one does not even test anymore and the other is not testing now. This is detrimental to new graduates of ITP programs as there is no way for them to obtain certifications at this time. This law is also harmful to the deaf community members on the Eastern Shore and Western Maryland. It will have reverberating effect that will hinder paying client's willingness to provide Live Interpreters for the deaf persons due to raising rates.</p>
	<p>What happens if they find out the deaf consumer is lying about the situation? Will that Deaf Client be fined? Who will pay for the lost wages for the interpreter while this process is going on? This law would be harmful to any agency. The law expressly say it requires certification by one of three bodies and one does not even test anymore and the other is not testing now. This is detrimental to new graduates of ITP programs as there is no way for them to obtain certifications at this time. This law is also harmful to the deaf community members on the Eastern Shore and Western Maryland. It will have reverberating effect that will hinder paying client's willingness to provide Live Interpreters for the deaf persons due to raising rates.</p>
	<p>The regulations do not define how harm is evaluated or how the determination is made to pursue restorative justice versus formal hearings.</p> <p>A Deaf consumer files a complaint about an interpreter's performance in an emergency appointment. It is unclear whether the interpreter will face a formal hearing or be offered restorative justice, and neither party knows whether participation is truly voluntary.</p>

<p>B. If the license holder or applicant requests a hearing in writing within the 30-day period, the Board shall promptly refer the case to the Office of Administrative Hearings.</p>	<p>The regulation does not specify a time frame for when this meeting must take place. Without a clearly defined deadline, complainants and licensees alike may experience prolonged uncertainty or delays, undermining confidence in the fairness and efficiency of the process.</p> <p>Similarly, Sections 12(A) and (B) state that: "The Board shall promptly refer the case to the Office of Administrative Hearings..."</p> <p>Concern: Yet the term "promptly" is subjective and undefined, leaving room for inconsistent interpretation or delays in time-sensitive matters. "To ensure transparency, accountability, and timely resolution of complaints, I recommend that the regulations be revised to include formal, clearly defined time frames. For example:</p> <ul style="list-style-type: none"> • The term "promptly" in Section 12 should be clarified by requiring referral to OAH within 10 business days of the Board's determination. <p>These additions would improve procedural fairness and help all parties understand and anticipate next steps in the complaint and disciplinary process."</p>
	<p>Yet the term "promptly" is subjective and undefined, leaving room for inconsistent interpretation or delays in time-sensitive matters.</p> <p>To ensure transparency, accountability, and timely resolution of complaints, I recommend that the regulations be revised to include formal, clearly defined time frames. For example:</p> <p>The term "promptly" in Section 12 should be clarified by requiring referral to OAH within 10 business days of the Board's determination.</p> <p>These additions would improve procedural fairness and help all parties understand and anticipate next steps in the complaint and disciplinary process.</p>
	<p>Yet the term "promptly" is subjective and undefined, leaving room for inconsistent interpretation or delays in time-sensitive matters. To ensure transparency, accountability, and timely resolution of complaints, I recommend that the regulations be revised to include formal, clearly defined time frames. For example:</p> <p>The term "promptly" in Section 12 should be clarified by requiring referral to OAH within 10 business days of the Board's determination.</p> <p>These additions would improve procedural fairness and help all parties understand and anticipate next steps in the complaint and disciplinary process.</p>
	<p>Yet the term "promptly" is subjective and undefined, leaving room for inconsistent interpretation or delays in time-sensitive matters. To ensure transparency, accountability, and timely resolution of complaints, I recommend that the regulations be revised to include formal, clearly defined time frames. For example:</p> <p>The term "promptly" in Section 12 should be clarified by requiring referral to OAH within 10 business days of the Board's determination.</p> <p>These additions would improve procedural fairness and help all parties understand and anticipate next steps in the complaint and disciplinary process.</p>
<p>C. Hearing procedures are in accordance with the Administrative Procedure Act, State Government Article, §10-201 et seq., Annotated Code of Maryland, and with COMAR 28.02.</p>	
<p>D. The administrative law judge shall determine if the charges against the license holder or applicant are supported by a preponderance of the evidence.</p>	

<p>E. The administrative law judge shall submit in writing to the Board proposed findings of fact, proposed conclusions of law, and recommendations. The administrative law judge shall distribute this written proposed decision to the parties.</p>	
<p>F. A party objecting to the administrative law judge's proposed decision may file exceptions with the Board within 15 calendar days of the date of the decision, and:</p> <ul style="list-style-type: none">(1) The party filing exceptions shall ensure that a copy of the exceptions is provided to the opposing party;(2) An opposing party may respond to the exceptions within 15 calendar days of the date of the exceptions;(3) All parties shall have an opportunity for oral argument before the Board before a final decision is made;(4) The Board shall limit oral/signed argument to 15 minutes per side;(5) The Board may refuse to consider facts that the party could have produced at the hearing; and(6) The Board may abrogate, change, or modify the original decision, or remand the case to the Office of Administrative Hearings.	

Regulations	Concerns/Comments
<p>.13 Record of Hearings.</p> <p>A. The Office of Administrative Hearings shall prepare an official case record as provided in COMAR 28.02.01.23.</p>	
<p>B. The Office of Administrative Hearings shall record the proceedings before the administrative law judge.</p>	
<p>C. A party requesting a transcript of the proceedings, or part of the proceedings, shall pay the costs of the transcript, and a party requesting an expedited transcript shall pay the costs of the expedited transcript.</p>	<p>Clarify whether administrative fees for transcripts fall on the complainant, interpreter, or Board.</p> <p>If a low-income freelance interpreter is required to pay transcript fees to appeal a complaint outcome, the financial burden could effectively block access to due process</p>

Regulations	Concerns/Comments
<p>.14 Restorative Justice.</p> <p>A. The Board may use a restorative justice program upon request by the complainant.</p>	<p>Restorative Justice is not defined</p> <p>What is the process?</p> <p>What is the training for those leading the restorative justice?</p> <p>-13 providers in MD per the link below https://members.nacri.org/rj-map/Find?term=&advFilter=eyJDDXN0b21GaWVsZFZhbnVlcyl6W10slkNvdW50cmllcyI6W10sIlN0YXRlcyl6WyJNRCJdLCJDaXRpZXMlOltLCJQb3N0YWxDb2Rlcyl6IiIsIkNhdGVnb3J5VmFsdWVzljpbXSwiUmFkaXVzIjoicj9</p> <p>-§ National Association of Community and Restorative Justice (NACRJ), in collaboration with National Center on Restorative Justice (NCORJ) at Vermont Law and Graduate School and the Center for Restorative Justice at University of San Diego, hosts this map of organizations, education institutions, and other entities across the United States that offer restorative justice services.</p> <p>-Who pays them?</p> <p>- Are there any restorative justice practitioners who know ASL/ are Deaf?"</p>
	<p>Is the restorative justice plan appropriate for the K12 setting with students who are minors? How will the Board work with local education agencies regarding the restorative justice plan outlined in the regulations?</p>
	<p>There are growing concerns over the grievance process. All complaints are handled in house, by the board and ODHH. It's a small community, we all know each other, or know of each other. Even raters for the CASLI, who are just looking at the work samples, are required to skip a tester if they know that person. We all have inner bias whether we realize it or not, and in such a small community it's hard to be completely unbiased. How do we know complaints are going to be handled fairly? Are names at the very least stricken from the record so the situation can be seen for what it is from both sides before judgement is made? Are Deaf people allowed to make complaints in person or in video online? Since some Deaf people truly need ASL that should be an option, but obviously if it is their privacy isn't protected. If someone making the decisions on their behalf already really loves or really hates this person they see on screen, how are they going to be unbiased? What is being done to support protection on both ends and ensure justice is chosen in each case, rather than personal feelings?</p> <p>Disciplinary actions include possible courses, training, and restorative justice programs. Are any of these things ready to go when the law becomes enforceable? If not, and two months in you have interpreters who are deemed necessary to do one or more of these things are they just going to have to wait?</p>

	<p>Thank you for including restorative justice under .14. However, the framework lacks: A clear definition of what restorative justice means in this context</p> <p>Procedural guidance</p> <p>Clarity on voluntariness</p> <p>Defined outcomes (e.g., reduced penalties, record expungement)</p> <p>I recommend including explicit guidance on process, confidentiality, and consent.</p> <p>Complaint Review & Investigations The regulations remain unclear about: Who conducts investigations</p> <p>How harm is determined</p> <p>What standards are used to triage complaints</p> <p>Whether restorative justice replaces or pauses a formal complaint process</p> <p>Whether cultural or interpersonal conflict is treated the same as professional misconduct</p> <p>Conclusion Improving interpreter quality is a shared goal. But quality cannot come at the cost of access, restriction, or compromise a Deaf, DeafBlind, or Hard of Hearing individual's right to an interpreter they trust, further disempowering the Deaf community. As written, these regulations may reduce services and expose state agencies to legal risk. I urge the Board to incorporate these recommendations to ensure the final rules are inclusive, legally sound, and equitable for all Marylanders. Thank you for your time and your commitment to the Deaf, DeafBlind, and Hard of Hearing community.</p>
B. The Board shall contract with qualified restorative justice mediator(s) or facilitator(s) to lead this process.	

Regulations	Concerns/Comments
<p>.15 Grace Period. Individuals shall not be subject to penalty for failing to comply with the provisions of this chapter until January 1, 2026.</p>	<p>I think it's common knowledge that the bill itself is being taken back to Annapolis next year for a revision that will allow for a lot more flexibility in options for interpreters to work. Right now the only options to work for pay are the NIC or the BEI, neither one are very accessible or affordable and we do need further options, especially for those on their way into the field or out of it.</p> <p>With that in mind, the start date still stands as January 1st, 2026, but the amendment won't have happened by then. I propose the start date be pushed back another 6 months in order to give the board the time to develop and implement whatever the other options are going to look like. I know there's been talk of accepting the EIPA, and adding a grandfather clause. If the start date stands on January 1st neither of those options will be viable for an unknown period of time, forcing people to temporarily leave the field while those options are worked on, maybe they won't come back by the time a valid option has been offered for them.</p>
	<p>Compliance Timeline</p> <p>Finally, we urge the Board to extend the grace period for compliance with the new licensure requirements to July 1, 2026. This extension will provide employers and interpreters with critical additional time to adapt to the new framework without risking service disruptions.</p>
	<p>5. Grace Period: While we appreciate the inclusion of a grace period before enforcement begins, we recommend extending this grace period to July 1, 2026. Given the current interpreter shortage, hospitals and healthcare systems will require additional time to assess workforce gaps, revise contractual arrangements with agencies providing interpreting services, and ensure compliance without disrupting patient care. Extending the grace period by six months provides essential flexibility to operationalize the new requirements while minimizing access barriers.</p> <p>Finally, we request clarification on the timeline by which the Board plans to implement the licensure process for sign language interpreters. This information is essential to ensure hospital compliance and secure the ability to provide high-quality care.</p>
	<p>3. COMAR 14.41.01.15 Grace Period.</p> <p>The proposed regulations state that “individuals shall not be subject to penalty for failing to comply with the provisions of this chapter until January 1, 2026.” UMMS appreciates the inclusion of a grace period and the accompanying recognition that hundreds or thousands of individuals will not be able to apply overnight, and that it will take an extended period of time for ODHH and SBSLI to review, process, and approve the same.</p> <p>While UMMS does appreciate the grace period, as drafted Regulation .15 raises a few concerns. First, the length of time for the grace period is inadequate. If the proposed regulations are adopted without any substantive changes, the earliest they could take effect would likely be the end of July. This would mean that ODHH and SBSLI would have less than 5 months to develop an application and review process, develop and implement a public awareness campaign (as required by statute), educate stakeholders and potential applicants on the application requirements, solicit and accept applications, and review, process, and approve applications. It is most common in the State for regulatory agencies to allow a period of 12 months or more to adopt and implement a new licensing scheme. The timeline becomes even more unrealistic if the regulations must be amended and re-posted for public comment. Second, the proposed regulations require both individual interpreters and agencies that provide interpretation services to be licensed, but the grace period is extended only to individuals. As drafted, Regulation .15 could subject agencies to potential penalties on the first day the regulatory package takes effect.</p>

	<p>One year may be insufficient to ensure continuity of services.</p> <p>A rural hospital system reports that it will take at least 18 months to complete background checks and licensing for all contract interpreters. A one-year grace period could leave rural patients without interpreters before the process is finished.</p> <p>I recommend extending the grace period through January 1, 2027, with a public review before implementation.</p>
--	---

Regulations	Concerns/Comments
<p>.16 Reinstatement and Fees</p>	<p>.16 Reinstatement and Fees Clarify who is responsible for fees associated with licensure, complaint hearings, and restorative justice facilitation. Fees should be capped or prorated to avoid disproportionately burdening freelance and part-time interpreters.</p> <p>Deaf, DeafBlind, and Hard of Hearing Interpreter Shortage and Access Equity Maryland already faces a shortage of qualified Deaf interpreters who are essential for working with Deaf, DeafBlind, and Hard of Hearing individuals, emerging ASL users, and in mental health settings. Without flexibility, this rule may worsen access for the very populations the regulations are intended to protect.</p> <p>A Deaf immigrant family seeking services in a domestic violence shelter. The only interpreters with cultural and linguistic expertise in their specific dialect are not yet licensed in Maryland. This family risks re-traumatization and delays in safety planning because of rigid credentialing rules.</p> <p>Recommendations and Suggested Language: Federal Compliance Override Clause “Nothing in these regulations shall be construed to prohibit or limit actions necessary to comply with federal law—including the ADA, Section 504, IDEA, or Section 1557 of the ACA—when no licensed provider is available.” Flexibility in Educational and Medical Settings “If a licensed interpreter is not available despite good-faith efforts, a qualified but unlicensed interpreter may be used to prevent delays.” Revise Educational Interpreter Requirements “A public agency may use an interpreter with an EIPA score below 3.7 if the interpreter is under supervision or deemed appropriate by an IEP team.” Expand Provisional License Usage “Provisionally licensed interpreters may work unsupervised in time-sensitive settings if no licensed interpreter is available.” Amend Agency Penalties “Agencies documenting a good-faith effort to hire licensed interpreters shall not be penalized when no such provider was available.” Clarify Internal Inconsistencies Issue guidance to harmonize .04(D), .04(G), .06(D), .07(B), and .11(B)(3). Extend the Grace Period Extend through January 2027 and conduct a public review.</p>

<p>.16 Reinstatement After a Period of Inactivity, Suspension, or Revocation.</p> <p>A. The Board shall reinstate the license of an individual who for any reason has failed to renew the license if the individual:</p> <p>(1) Applies to the Board for reinstatement;</p> <p>(2) Meets the renewal requirements of Regulations .06 or .07 of this chapter; and</p> <p>(3) Pays to the Board the renewal fee and the reinstatement fee set by the Board.</p>	<p>I think you probably meant to say "Regulations .05 and .06".</p>
<p>Section .16 says that the license of an individual can be reinstated after a period of inactivity, suspension, or revocation.</p>	<p>Can the license of an agency also be reinstated after the same periods?</p>
<p>B. The Board shall reinstate the license of an individual whose license has been suspended if the individual:</p> <p>(1) Applies to the Board for reinstatement after the period of suspension has ended;</p> <p>(2) Meets the renewal requirements of Regulations .06 or .07 of this chapter; and</p> <p>(3) Pays to the Board the renewal fee and the reinstatement fee set by the Board.</p>	<p>I think you probably meant to say "Regulations .05 and .06".</p>
<p>C. The Board may reinstate the license of an individual whose license has been revoked if the individual:</p> <p>(1) Applies to the Board for reinstatement no less than 5 years after their license was revoked.</p> <p>(2) Presents to the Board a petition demonstrating good cause for reinstatement;</p> <p>(3) Meets the renewal requirements of .06 or .07 of this chapter; and</p> <p>(4) Pays to the Board the renewal fee and reinstatement fee set by the Board.</p>	<p>I think you probably meant to say "Regulations .05 and .06".</p>

Regulations	Concerns/Comments
-	<p>We're asking for a waiver or a grandfather clause to be added for interpreters who have been working professionally for 15+ years and are 50 years of age and older. Longevity like that in any field is something to be respected and valued. Don't make these seasoned interpreters go back to square one, forcing them to learn modern textbook terminology in order to pass a one day test. They've already passed the Deaf community test, that should be more than enough. It doesn't make sense for someone to go through that time and expense if they're only going to work a few more years. If the 15+ years of history isn't adequate for those on their way out of the field then maybe those who only want to work another 10 years can get a "nearly retired" license at a discounted price, without having to go through the certification process. This is only a temporary need as in another 10-20 years it shouldn't be an issue as everyone will be certified. It's only a temporary issue because interpreters didn't need to be certified until now. Let those who are close to retirement, or just picking up an odd job here and there continue to do so without having to prove themselves all over again. Allow more options and grace for those currently on their way out of the field anyway, don't force them out on a technicality, let them bow out with grace when they're ready.</p>
-	<p>Proposal: Grandfather Clause for Veteran Interpreters To address the interpreter shortage while maintaining high standards, I propose a grandfather clause (GFC) for seasoned interpreters who have demonstrated long-term competence and community trust. This clause could apply to interpreters who:</p> <ul style="list-style-type: none"> • Are age 50+ with 15+ years of interpreting experience; • Have a clean professional and legal record; • Are in good standing with the Deaf and Hard of Hearing communities; • Can provide two professional/community references (e.g., agency, Deaf client, colleague); • Are known to be culturally aligned, dependable, and responsive. <p>These interpreters have the flexibility, availability, and experience to respond quickly in emergencies and fill in where the need is greatest. By formally recognizing them, the state can retain invaluable talent and stabilize interpreter availability during this regulatory transition.</p>
-	<p>The Grandfather Clause (GFC)</p> <p>We are asking for a waiver or a ""grandfather clause"" to be added for interpreters who have been working for many years/decades professionally. They are respected and valued, and are near the end of their career or nearing retirement. We want them to have the incentive to continue in the field, as the ""support net"" that we desperately need, especially with the interpreter shortage in the rural areas and small towns.</p> <ul style="list-style-type: none"> * We are talking about ""Qualified Interpreters."" * They are 50 years old or more. We don't want to lose the expertise and stability they have provide and have been providing. * The GFC would require they have 15 plus years of professional interpreting experience. * Interpreters who are in good standing with the Deaf and Hard of Hearing communities. * They have two (2) references stating how long they have known them, and in what capacity (i.e. friend, interpreter, co-worker, etc.) * No legal issues. * No substance abuse. * Supportive of the Deaf and Hard of Hearing community. * They are known to be of good character, honest and loyal to the culture and communities of the Deaf, Hard of Hearing, and Deaf/Blind. <p>The Grandfather Clause (GFC) will help during this time of transition. Interpreting is not our business, it is our purpose!</p>
-	<p>Regarding Economic Impact, the regulations will most certainly impact current non-certified free-lance interpreters, including some who have provided interpreting services in the State for many years. Many have established relationships with, and may be preferred by, Deaf, DeafBlind, and Hard of Hearing individuals in a variety of settings. Certification is a great benchmark; however, it does not take into account consumer satisfaction nor preference. Sadly, there appears to be no grandfather clause for interpreters who have been working in this field for quite a while. Such clause would minimize adverse impact on this group, and on individuals who desire or prefer these free-lancers' services based on known interpreting abilities and/or established interpreting relationships.</p>

	<p>Allow for Employer or Group Licensure for Internal Interpreting Services</p> <p>We urge the Board to create a licensure pathway for employers who provide in-house interpreting services exclusively to their own employees or job applicants. Many large, multistate employers maintain internal teams of qualified interpreters, often providing services remotely via video relay for video remote interpreting. Requiring each interpreter on such a team to become individually licensed in Maryland – regardless of whether they reside in or regularly operate within the state – creates an artificial barrier to compliance and service delivery.</p> <p>For example, some national companies meet their legal obligations to provide qualified interpreting services to their employees by hiring an internal cadre of qualified sign language interpreters that can be deployed when needed in locations throughout the country. The operational scope of these companies and varied workload given to their interpreters makes compliance with individual state licensing regimes onerous and can result in unnecessary barriers to access. The proposed rules do not address this scenario. Instead, the proposed rules would require internal interpreters to either become individually licensed in Maryland or be limited to no more than 80 hours of interpreting services in Maryland per year and mandate that they file individual reports after completing each assignment.¹</p> <p>We urge the Board to consider a more flexible approach. Specifically, the Board could allow employers to apply for a collective license to provide qualified interpreting services in Maryland, including virtual or remote services. This change would enable employers to meet state standards without requiring each interpreter to obtain an individual Maryland license and comply with additional administrative reporting requirements. Other states have successfully implemented similar policies. Iowa, for example, allows employers to become licensed providers under state law and exempts their interpreters from individual licensure.² Similarly, Idaho recently enacted legislation that permits entities to secure licenses for remote video interpreting services and exempts persons employed by such entities from the individual license requirement.³</p>
-	<p>Is there any discussion that educational interpreters who have been working for a protracted period of time more than 20 years and whether or not there will be some kind of "grandfathering "in</p>
-	<p>I would like to make a few comments regarding the posted Regulations for the Maryland State Sign Language Interpreter Licensure. As written, the Regulations are not viable for areas such as Western Maryland and the Eastern Shore. Currently there are not enough Qualified Interpreters to cover these areas let alone certified ones. Agencies in these areas struggle daily to provide services needed. Forcing Interpreters to carry a license in these areas will have a negative impact on the availability. The Majority of Interpreters in these areas work through an agency. The agency should be responsible for regulating their interpreters. Another suggestion we would like to offer is that if an Interpreter has been working in the State of Maryland and can prove as such without any issues, for a specific period of time should be allowed to be grandfathered in to the program. Circumstances across the State are not the same and we feel that all areas should be taken into considerations when writing this bill, as it is written now , multiple deaf and hard of hearing individuals are going to suffer the loss of interpreters.</p>
-	<p>I would like to make a few comments regarding the posted Regulations for the Maryland State Sign Language Interpreter Licensure. As written, the Regulations are not viable for areas such as Western Maryland and the Eastern Shore. Currently there are not enough Qualified Interpreters to cover these areas let alone certified ones. Agencies in these areas struggle daily to provide services needed. Forcing Interpreters to carry a license in these areas will have a negative impact on the availability. The Majority of Interpreters in these areas work through an agency. The agency should be responsible for regulating their interpreters. Another suggestion we would like to offer is that if an Interpreter has been working in the State of Maryland and can prove as such without any issues, for a specific period of time should be allowed to be grandfathered in to the program. Circumstances across the State are not the same and we feel that all areas should be taken into considerations when writing this bill, as it is written now , multiple deaf and hard of hearing individuals are going to suffer the loss of interpreters.</p>
-	<p>I would like to make a few comments regarding the posted Regulations for the Maryland State Sign Language Interpreter Licensure. As written, the Regulations are not viable for areas such as Western Maryland and the Eastern Shore. Currently there are not enough Qualified Interpreters to cover these areas let alone certified ones. Agencies in these areas struggle daily to provide services needed. Forcing Interpreters to carry a license in these areas will have a negative impact on the availability. The Majority of Interpreters in these areas work through an agency. The agency should be responsible for regulating their interpreters. Another suggestion we would like to offer is that if an Interpreter has been working in the State of Maryland and can prove as such without any issues, for a specific period of time should be allowed to be grandfathered in to the program. Circumstances across the State are not the same and we feel that all areas should be taken into considerations when writing this bill, as it is written now , multiple deaf and hard of hearing individuals are going to suffer the loss of interpreters.</p>

-	I am concerned for my colleagues who have 20 years of experience who are about to lose work. I am concerned for my friends who are brilliant CODAs without formal education and some of the best interpreters I know. I am concerned for new graduates who are eager to start their careers but will be extremely limited in the work they can take. I am concerned for myself, an interpreter who just wants to continue the job that I love and provide services for the Deaf community to the best of my ability. Most importantly, the Deaf community is going to pay the ultimate price for these new license requirements making everyday life more difficult. I believe some of these steps are in the wrong direction and the needs of the Deaf community and interpreters need to be taken into account as these decisions move forward.
-	<p>I would like to make some comments regarding the posted Regulations for the Maryland State Sign Language Interpreter Licensing.</p> <p>The Regulations are not suitable for areas such as Western Maryland and the Eastern Shore.</p> <p>Currently there are not enough Qualified Interpreters to cover these areas let alone certified ones. Agencies in these areas struggle daily to provide services needed. Forcing Interpreters to carry a license in these areas will have a negative impact on the availability.</p> <p>The Majority of Interpreters in these areas work through an agency. The agency should be responsible for regulating their interpreters.</p> <p>Another suggestion we would like to offer is that if an Interpreter has been working in the State of Maryland and can prove as such without any issues, for a specific period of time should be allowed to be grandfathered into the program.</p> <p>Circumstances across the State are not the same and we feel that all areas should be taken into considerations when writing this bill, as it is written now, multiple deaf and hard of hearing individuals are going to suffer the loss of interpreters</p>
.04 License Required, .05 General License and .06 Provisional License –	This needs to include non-Certified with those who interpreted more than 10 years to be Grandfathered in and also would have to have an Agency to back them up as being qualified as ADA Law act requires.
.04 License Required, .05 General License and .06 Provisional License –	This needs to include non-Certified with those who interpreted more than 10 years to be Grandfathered in and also would have to have an Agency to back them up as being qualified as ADA Law act requires.

Regulations	Concerns/Comments
-	<p>I am greatly concerned about this law's impact on Deaf spiritual community of choice by limiting it to certified interpreters especially when many religious interpreters are serving from their values and not from their professionalization. Will this limit the number of places Deaf people can attend when the only practitioners are paid certificated professionals. If a Deaf person does not mind an uncertified interpreter, is there a waiver that the church or person can sign? This will also impact access to programs within smaller Deaf communities of faith.</p>
-	<p>Concern – Application of Licensure Requirements to Religious Interpreting</p> <p>I would like to raise concern about how the law applies to interpreters working in religious settings. I am a certified interpreter, and I both provide services and contract other interpreters for faith-based events.</p> <p>Religious institutions are not legally required to provide interpreters, so it's unclear why licensure would be required in these settings. Many of the interpreters in my religious community are not certified, but they are absolutely qualified. In these contexts, "qualified" means having a deep understanding of the religion, culture, values, terminology, and best practices specific to the faith. Certification alone does not prepare someone to interpret effectively in these spaces — and requiring it may actually reduce access, not improve it.</p> <p>Additionally, the pool of qualified religious interpreters is already very small, and those interpreters are often participating in religious life themselves at the exact times services are needed. Placing licensure requirements on this group will further shrink an already limited pool of providers, which could unintentionally limit language access for Deaf consumers in faith-based settings.</p> <p>I urge the Board to consider whether licensure should apply to settings where interpreting is not legally mandated, and to avoid placing unnecessary barriers in front of qualified interpreters who serve their communities in good faith.</p>
-	<p>There have been several town hall meetings regarding State Board of Sign Language Interpreters regulations. Have the coordinators of interpreters of all the churches and interpreter agencies in the DMV been informed of the town hall meetings? Have the coordinators of interpreters in all agencies and churches in the DMV been informed of the regulations?</p>
-	<p>Pt. 36, App. B "Religious entity." The term "religious entity" is defined in accordance with section 307 of the ADA as a religious organization or entity controlled by a religious organization, including a place of worship. Section 36.102(e) of the rule states that the rule does not apply to any religious entity. The ADA's exemption of religious organizations and religious entities controlled by religious organizations is very broad, encompassing a wide variety of situations.</p>
-	<p>Having been the Coordinator of Deaf Ministry for the Archdiocese of Baltimore for seven years (I have since retired from this position), I am very aware of the lack of interpreters for Catholic religious settings. FYI, the Archdiocese of Baltimore includes all of Western Maryland, Central Maryland, and the Baltimore/Annapolis area. Just recently, I was contacted because the Archdiocese of Washington (including PG and Montgomery Counties) was unable to find interpreters for their Catholic setting.</p> <p>Interpreting in a Catholic religious setting requires a unique set of skills. It requires knowledge of the vocabulary used in these settings and the signs used for this vocabulary by the Catholic Deaf Community. In addition, it requires knowledge of Catholic rites and practices, as well as skill in interpreting the Sacred Scriptures. Finding an available interpreter with these skills is very challenging.</p> <p>In the Archdiocese of Baltimore, we have been blessed to have a full-time Deaf priest (one of only 14 in the world). However, there are only two interpreters available to interpret for him.</p> <p>I have talked with many Deaf people about the issue of licensure for religious interpreters. All of the Deaf people I have talked to object to requiring licensure for interpreters in a religious setting. They are aware of the challenges of finding an interpreter for these settings and believe that a licensure requirement will backfire and leave them with fewer available interpreters, and with interpreters who do not have the skills needed to provide the services they need. Many thought that religious interpreting was exempted from the licensing requirements.</p> <p>I agree with the need for the assurance of qualified interpreters for legal, medical, and educational settings. However, I believe that religious interpreters should be exempted from the licensing requirements.</p> <p>Additional points for consideration:</p> <p>There has been an insufficient amount of time for comment and input from the Deaf Community members who attend religious services, the faith communities who provide services to members of the Deaf Community and pay for this, and the interpreters who provide service to the Deaf in religious settings.</p> <p>Less than 10% of Deaf people attend religious services on a regular basis (statistics I have seen range from 1% to 7%). Because of this, the needs of this minority group within the Deaf Community is being overlooked by the regs that are being applied to all interpreting situations within the entire Deaf Community. The feedback of this subgroup needs to be sought and addressed.</p>
-	<p>I wanted to say that it is good for sign interpreters to have some regulation. But the fear in the religious community is that we may lose access to interpreters for limited things like having one Mass on a weekend signed. It is already difficult to find sign interpreters for Masses, esp those who understand the religious world. So I would caution against applying the same level of regulation/need for certification for these interpreters. It might end up w the deaf/hearing impaired religious community being LESS well served.</p>
-	<p>Even though, I support the need for assuring quality interpreters for all Deaf and Hard of Hearing people through certification and licensure, I strongly DISAGREE with making licensure a requirement for religious settings. I oppose this for the following reasons:</p> <p>I am a RID certified sign language interpreter that does work within religious settings mostly in the Catholic Church. There are very FEW interpreters for this setting and many of them are not certified for professional and/or personal reasons.</p> <p>By requiring licensure, the number of available interpreters for religious settings especially the Catholic church will decrease even more. Most licensed interpreters work during business hours, and they are off on the weekends.</p> <p>Requiring licensure does not guarantee quality access to religious settings because ITP programs do not offer training in Religious lexicon, traditions or the signs used by the Deaf within that setting. On a personal note, I have participated in meetings where one of the best interpreters in the area did not sign the message accurately because the terminology and context was not familiar to this person.</p> <p>Often interpreters in religious settings are ""called"" to do this because of a relationship with the Deaf and adequate background knowledge of the church, temple or mosque traditions. They are comfortable with the culture, language, practices as well as the text used regularly, OR they have had the opportunity to be trained in signs developed and used by the Deaf of that faith practice. It is not easy work and so those that do it are connected to the setting in a unique way.</p> <p>I am currently aware that many Deaf and Hard of Hearing individuals are not aware of the proposed licensure regulation including the leaders of two Deaf Churches in my area. This prevents the Deaf and HH community the opportunity to comment and share their thoughts and concerns. I deem this unfair to those that require interpreting for access to religious settings.</p> <p>Therefore, I am asking this regulation be changed so that ASL interpreters in Religious settings are not required to be licensed. This will only HARM the Deaf and Hard of Hearing community NOT improve access and quality of sign language services in this setting. It will block access which is not acceptable in this day and age.</p>
-	<p>I strongly disagree with the proposed regulation to require ASL religious interpreters to be licensed for the following reasons: I am a member of the Deaf Catholic Community in the Archdiocese of Baltimore. There are not enough interpreters that are willing and competent enough to interpret in Catholic settings. As a Deaf priest, I struggle to find competent interpreters to voice for me when I celebrate Mass or perform religious services that include non-signing hearing people. And I feel it is MY right as a DEAF PRIEST to choose an interpreter whom I feel comfortable working with regardless s/he is certified or licensed. Not all licensed interpreters want to work on Saturdays or Sundays. The ITP programs do not offer training in religious terminology, traditions, prayers and signing church music. therefore, interpreters do not want to interpret in a religious setting because they do not have the skill set. If the regulation passes, the harm it does to me and my faith community is unfair. We will be blocked from access to worship, faith development and a relationship with God. I oppose the passing of this regulation that becomes effective on January 1, 20206.</p>
-	<p>I disagreed with the law requiring sign language interpreters at Catholic settings to be licensed for several reasons.</p> <p>Firstly, many interpreters refuse to work on Saturdays and Sundays, as they consider those days to be their free days. Secondly, many interpreters lack training in interpreting at churches, as they are unfamiliar with religious terminology, prayers, and signing songs.</p> <p>As the responsible person for assigning sign language interpreters for our Catholic masses, I found it challenging to find suitable interpreters. Many of them were uncomfortable interpreting in religious settings.</p> <p>If the law is passed, it would limit our access to our faith community, which is unfair.</p>

-	<p>I strongly disagree with the proposed regulation to require ASL religious interpreters be licensed for the following reasons: I am a member of the Deaf Catholic Community in the Archdiocese of Baltimore. There are not enough interpreters that are willing and competent enough to interpret in Catholic settings. I have experienced several times that no interpreter was willing to take the assignment at the church and we were left with no access to the information during the mass. We had a difficult time finding interpreters to work at an all-day retreat. With that regulation, it will create a huge impact to our Deaf Catholic Community as well as other deaf church goers.</p> <p>Not all licensed interpreters want to work on Saturdays or Sundays. They often work full time during the business hours and the weekends are when they are off.</p> <p>The ITP programs do not offer training in religious terminology, traditions, prayers and signing church music. Therefore, interpreters do not want to interpret in a religious setting because they do not have the skill set. Very few religious interpreting workshops are offered in this area for licensed interpreters to attend. The chance to become competent in this type of interpreting is very limited.</p> <p>If the regulation passes, the harm it does to me and my faith community is unfair. We will be blocked from access to worship, faith development and a relationship with God. I will be denied the opportunity to guide my children and support their religious formation. I oppose the passing of this regulation that becomes effective as of January 1, 2026.</p>
-	<p>I strongly disagree with the proposed regulation to require ASL religious interpreters be licensed for the following reasons: I am a member of the Deaf Catholic Community in the Archdiocese of Baltimore. There are not enough interpreters that are willing and competent enough to interpret in Catholic settings. (add a personal experience here if you want)</p> <p>Not all licensed interpreters want to work on Saturdays or Sundays. They often work full time during the business hours and the weekends are when they are off.</p> <p>The ITP programs do not offer training in religious terminology, traditions, prayers and signing church music. Therefore, interpreters do not want to interpret in a religious setting because they do not have the skill set. Very few religious interpreting workshops are offered in this area for licensed interpreters to attend. The chance to become competent in this type of interpreting is very limited.</p> <p>If the regulation passes, the harm it does to me and my faith community is unfair. We will be blocked from access to worship, faith development and a relationship with God. I will be denied the opportunity to guide my children and support their religious formation. I oppose the passing of this regulation that becomes effective as of January 1, 2026.</p>
-	<p>I strongly disagree with the proposed regulation to require ASL religious interpreters be licensed for the following reasons:</p> <p>I am a member of the Deaf Catholic Community in the Archdiocese of Baltimore. There are not enough interpreters that are willing and competent enough to interpret in Catholic settings. The interpreters are a vital part of the Deaf community here at the Deaf Catholic Community in the Archdiocese of Baltimore. They help hearing people and also fellow hard-of-hearing/Deaf members with voice interpretation or ASL interpretation when Fr. Michael Depcik is out of town, he asks a few priests to fill in his spot and most of them don't know ASL. The interpreters help all of the Deaf members at our church follow through during mass. If this is taken away from us, you are taking away our communication accessibilities which creates more barriers for us.</p> <p>Not all licensed interpreters want to work on Saturdays or Sundays. They often work full time during the business hours and the weekends are when they are off.</p> <p>The ITP programs do not offer training in religious terminology, traditions, prayers and signing church music. Therefore, interpreters do not want to interpret in a religious setting because they do not have the skill set. Very few religious interpreting workshops are offered in this area for licensed interpreters to attend. The chance to become competent in this type of interpreting is very limited.</p> <p>If the regulation passes, the harm it does to me and my faith community is unfair. We will be blocked from access to worship, faith development and a relationship with God. I will be denied the opportunity to guide my children and support their religious formation. I oppose the passing of this regulation that becomes effective as of January 1, 2026.</p>
-	<p>Hello, I strongly disagree with the proposed regulation to require ASL religious interpreters be licensed for many reasons. I am the Coordinator of the Deaf Ministry Program for the Diocese of Fort Worth Texas. I have the hardest time finding an interpreter that is willing and competent enough to interpret in Catholic Church settings. They have not had the training in traditions, prayers and signing church music - their skill set is limited in this area.</p> <p>Many licensed interpreters prefer to keep their weekends 'un-working' and when they interpret in a religious setting it is from their love of the faith, or community. We pay a stipend to the interpreters - they continue to add to their skill set and continue to learn, there is no need to be licensed.</p> <p>I feel if the regulation passes in Baltimore, it will spread to additional areas of the country and it will harm our faith community. The Deaf will be blocked from access to worship, faith development and a relationship with God. There are many, people that join in their faith community to worship God, to require a license for an interpreter to use ASL is unfair.</p> <p>Please DO NOT pass this regulation that becomes effective as of January 1, 2026.</p>
-	<p>Religious services should not be restricted to be interpreted in ASL just by certified interpreters since churches are built to part of a community. Community members, skilled to do services interpreting, should be allowed to continue to do so in a voluntarily manner. Church is about service and accessibility, and should never be a matter of discussion in topics that prevents that. As a member of the Catholic Church in the Archdioceses of Baltimore and member of the Deaf Community located in the Frederick County area, I strongly oppose to this regulation and encourage legislators to better serve the deaf community by supporting initiatives that promotes accessibility and a stronger sense of service and unification.</p>
-	<p>I strongly disagree with the proposed regulations to require ASL religious interpreters be licensed in Maryland.</p> <p>I am a member of St. Peter the Apostle Church in Oakland, MD.</p> <p>I had a wonderful interpreter who was not licensed for several years. He is very skilled in religious sign language. Unfortunately, he passed away last year. I asked Parish Staff for another interpreter. We searched for interpreters in Garrett County, MD and Tucker County, West Virginia. It was expensive as they asked to pay their salary and travel expenses. Our Church cannot afford an interpreter. I had to find another means of communication using the tablet with a live transcribe program. The cost is reasonable with this kind of technology.</p> <p>I oppose the passing of this regulation that becomes effective as of January 1, 2026.</p>
-	<p>I believe interpreters in religious settings should be exempt from this law. My churches have often used students who want practice or recent graduates who do not have certification. It is very difficult to get interpreters for church. Thank you.</p>
-	<p>I strongly disagree with the proposed regulation to require ASL religious interpreters be licensed for the following reasons:</p> <p>I am a member of the Deaf Catholic Community in the Archdiocese of Baltimore. There are not enough interpreters that are willing and competent enough to interpret in Catholic settings.</p> <p>Not all licensed interpreters want to work on Saturdays or Sundays. They often work full time during the business hours and the weekends are when they are off.</p> <p>The ITP programs do not offer training in religious terminology, traditions, prayers and signing church music. Therefore, interpreters do not want to interpret in a religious setting because they do not have the skill set. Very few religious interpreting workshops are offered in this area for licensed interpreters to attend. The chance to become competent in this type of interpreting is very limited.</p> <p>If the regulation passes, the harm it does to me and my faith community is unfair. We will be blocked from access to worship, faith development and a relationship with God. I will be denied the opportunity to guide my children and support their religious formation. I oppose the passing of this regulation that becomes effective as of January 1, 2026.</p>
-	<p>Is it not true that a religious organization is exempt from these regulations since it is a primarily volunteer-based service ?</p>

	<p>I strongly disagree with the proposed regulation to require ASL religious interpreters be licensed for the following reasons:</p> <p>I'm part of the Deaf Catholic Community in the Archdiocese of Baltimore, and one of the biggest challenges we face is the lack of interpreters who are both willing and truly able to interpret in Catholic settings. The language used during Mass is unique and full of liturgical terms and deep spiritual meaning, and not every interpreter is trained or comfortable with that.</p> <p>There was one Holy Week service I attended where no interpreter was available, so I had to use an app called Live Transcribe. It barely worked as most of the text didn't make sense, and important parts of the prayers and homily were completely lost. Sitting there, trying to follow along, I felt disconnected from something that should've brought me closer to God.</p> <p>That's why having skilled interpreters in these spaces is so important. It's not just about understanding the words. It's about being part of the worship, the prayer, and the community.</p> <p>Not all licensed interpreters want to work on Saturdays or Sundays. They often work full time during business hours, and the weekends are when they are off.</p> <p>Most Interpreter Training Programs (ITPs) don't include any formal instruction on religious terminology, traditions, or practices. There's little to no training on how to interpret prayers, Scripture readings, or the unique language used in homilies and sacraments.</p> <p>Interpreting church music—especially hymns and liturgical responses is another area that's often completely overlooked.</p> <p>Because of this education gap, many interpreters understandably feel uncomfortable or unqualified to take on religious assignments. It's not a lack of willingness. It's a lack of preparation and support. Without the right training, they may fear misrepresenting the message or unintentionally showing disrespect in a sacred space. As a result, they often turn down opportunities to interpret in church settings.</p> <p>To make matters more difficult, there are very few religious interpreting workshops available in this area for certified interpreters to attend. Opportunities to learn and practice these skills, especially in a Catholic context, are extremely limited. For interpreters who do want to grow in this area, it can be frustrating to find so few resources or mentors available.</p> <p>This creates a real barrier not only for interpreters, but for Deaf Catholics who are left without full access to the heart of their faith. Without proper support and training, the gap between access and inclusion continues to grow.</p> <p>If the regulation passes, the harm it does to me and my faith community is unfair. We will be blocked from access to worship, faith development, and a relationship with God. I will be denied the opportunity to guide my children and support their religious formation.</p> <p>I oppose the passing of this regulation that becomes effective as of January 1, 2026.</p>
	<p>I strongly disagree with the proposed regulations to require ASL religious interpreters be licensed in Maryland.</p> <p>I am a member of St. Peter the Apostle Church in Oakland, MD.</p> <p>I had a wonderful interpreter who was not licensed for several years. He is very skilled in religious sign language. Unfortunately, he passed away last year. I asked Parish Staff for another interpreter. We searched for interpreters in Garrett County, MD and Tucker County, West Virginia. It was expensive as they asked to pay their salary and travel expenses. Our Church cannot afford an interpreter. I had to find another means of communication using the tablet with a live transcribe program. The cost is reasonable with this kind of technology.</p> <p>I oppose the passing of this regulation that becomes effective as of January 1, 2026.</p>
	<p>I strongly disagree with the proposed regulation to require ASL religious interpreters be licensed for the following reasons:</p> <p>I am a member of the Deaf Catholic Community in the Archdiocese of Baltimore. There are not enough interpreters that are willing and competent enough to interpret in Catholic settings. As a deaf parishioner, I've found it very difficult to fully participate in Mass and church events at the church because there is often no interpreter provided. It makes me feel left out, even though I want to be part of the faith community. I hope this can be addressed so that everyone, including the deaf community, can feel welcomed and included.</p> <p>Not all licensed interpreters want to work on Saturdays or Sundays. They often work full time during the business hours and the weekends are when they are off.</p> <p>The ITP programs do not offer training in religious terminology, traditions, prayers and signing church music. Therefore, interpreters do not want to interpret in a religious setting because they do not have the skill set. Very few religious interpreting workshops are offered in this area for licensed interpreters to attend. The chance to become competent in this type of interpreting is very limited.</p> <p>If the regulation passes, the harm it does to me and my faith community is unfair. We will be blocked from access to worship, faith development and a relationship with God. I will be denied the opportunity to guide my children and support their religious formation.</p> <p>I oppose the passing of this regulation that becomes effective as of January 1, 2026.</p>
	<p>I do not think that MD should be involved in requiring licensing for interpreters who work over 80 hours in a religious setting. The religious community has suffered thru the years with interpreters who are substandard. Finally many groups are paying interpreters and requiring certification or quality skills.</p> <p>So if licensure is required, religious communities may again revert back to using interpreters who are not qualified....because there will likely not be enough licensed interpreters who are willing to work in religious settings.</p> <p>Please do not get involved in requiring licensing for religious groups. I am a retired former certified interpreter and I worked in religious setting for my entire career of almost 50 years.</p>
	<p>I am an ordained minister in the United Methodist Church and the facilitator/director of Deaf ministries in the Peninsula-Delaware Conference area which includes churches in Delaware and Maryland on the Eastern Shore. I am also married to a Deaf man who uses American Sign Language as his primary language. Our denomination tries to provide American Sign Language interpreting for Sunday morning services and other church activities in as many churches as needed. Right now, we have a few ASL interpreters or Deaf pastors in Delaware, but we also have one ASL interpreter in one of our UM churches on Maryland's Eastern Shore and hope to have more. It is extremely difficult to find interpreters willing to do all of the preparation needed to interpret for the complex content of the Bible as well as ancient texts used in many hymns and liturgies and then also to work on Sundays when they perhaps prefer to attend their own churches or simply not be working on weekends. Therefore, we absolutely need those few interpreters who may not meet the same kind of professional certification or licensing that interpreters in schools, medical settings or legal settings absolutely should be required to meet due to the potential damage of poor interpretation in these settings. So in my role in the church setting, I'm concerned that the proposed bill will negatively impact churches because it only exempts interpreters who are compensated for 80 hours or less each year. This law would effectively end ASL interpreting for any Maryland United Methodist church. This is because most church interpreters interpret weekly worship services every Sunday plus special services like Christmas Eve and must spend at least an hour or more in preparation each week not to mention commuting time putting them well over the 80-hour limit being proposed. For example, the interpreter at the church in Delaware where my Deaf husband and I attend, spends 90 minutes commuting, one hour interpreting and two to three hours in preparation time each week. In addition, most church interpreters work for far less than the professional rate, but to expect them to work for free is unacceptable. Pastors, musicians, secretaries, custodians and others are all typically paid employees of churches. ASL interpreters fall into this category. Religious organizations have always been exempted from state requirements such as the ones being proposed in this bill. As written, this bill will definitely negatively impact churches and far more important, Deaf parishioners. Please exempt churches from this law. Thank you. Rev. Dr.</p>
	<p>I strongly disagree with the proposed regulation to require ASL religious interpreters be licensed for the following reasons:</p> <p>I am a member of the Deaf Catholic Community in the Archdiocese of Baltimore. There are not enough interpreters that are willing and competent enough to interpret in Catholic settings.</p> <p>Not all licensed interpreters want to work on Saturdays or Sundays. They often work full time during the business hours and the weekends are when they are off.</p> <p>The ITP programs do not offer training in religious terminology, traditions, prayers and signing church music. Therefore, interpreters do not want to interpret in a religious setting because they do not have the skill set. Very few religious interpreting workshops are offered in this area for licensed interpreters to attend. The chance to become competent in this type of interpreting is very limited.</p> <p>If the regulation passes, the harm it does to me and my faith community is unfair. We will be blocked from access to worship, faith development and a relationship with God. I will be denied the opportunity to guide my children and support their religious formation.</p> <p>I oppose the passing of this regulation that becomes effective as of January 1, 2026</p>

-	<p>I strongly disagree with the proposed regulation to require ASL religious interpreters be licensed for the following reasons:</p> <p>I am a member of the Deaf Catholic Community in the Archdiocese of Baltimore. There are not enough interpreters that are willing and competent enough to interpret in Catholic settings. I have experienced several times that no interpreter was willing to take the assignment at the church and we were left with no access to the information during the mass. We had a difficult time finding interpreters to work at an all-day retreat. With that regulation, it will create a huge impact to our Deaf Catholic Community as well as other deaf church goers.</p> <p>Not all licensed interpreters want to work on Saturdays or Sundays. They often work full time during the business hours and the weekends are when they are off.</p> <p>The ITP programs do not offer training in religious terminology, traditions, prayers and signing church music. Therefore, interpreters do not want to interpret in a religious setting because they do not have the skill set. Very few religious interpreting workshops are offered in this area for licensed interpreters to attend. The chance to become competent in this type of interpreting is very limited.</p> <p>If the regulation passes, the harm it does to me and my faith community is unfair. We will be blocked from access to worship, faith development and a relationship with God. I will be denied the opportunity to guide my children and support their religious formation. I oppose the passing of this regulation that becomes effective as of January 1, 2026.</p>
-	<p>I want to express my concern about requiring licensure for sign language interpreters in religious settings. This is a very specialized field and attracts individuals who not only interpret but are also well versed in very specific content and are connected to their religious community. If this regulation passes, I believe it will be more harmful than beneficial to the deaf community. Churches cannot afford agency interpreting rates, and agency interpreters are generally less interested in religious settings. Religious interpreters have unique skills that add tremendous value in religious settings. Many of these religious interpreters are not licensed, and it does not make them less qualified in this setting. There is already a shortage of religious interpreters - requiring licensure will only worsen the problem, providing less service to the deaf community. Thank you.</p>
-	<p>The SBSLI have required interpreters in religious if paid for services, must be certified and licensed by the state of Maryland.</p>
-	<p>a. Is there an appeal for this regulation with SBSLI? b. If nit, can interpreters in religious settings receive an extension to seat for the written NIC exam?</p>
-	<p>Lastly, the Regulations appear to interfere with Maryland citizens' right to freely exercise their religion. Specifically, my Christian faith calls for Disciples of Jesus Christ to serve one another, in love, with our God-given gifts and talents. There is also a biblical command to be generous and show appreciation to those who serve. As a result, it's common practice for some churches to give honorariums, or love offerings, to their volunteers. By subjecting non-certified sign language interpreters to these regulations, the State will be prohibiting certain religious organizations from practicing their faith. This will also promote disparate treatment towards one class of interpreters, as other foreign language interpreters are not subject to these or similar types of State regulations.</p>
-	<p>It seems unfair that a church member/interpreter cannot receive an honorarium check or gift from a church for serving without being license or certified. It should matter that the interpreter is 'Qualified'. Please reconsider this decision.</p>
-	<p>I need to say that I disagree with the idea of requiring religious interpreters certified. It's because it's hard enough to find any religious interpreters available and the few we have in the whole state of Maryland can make it difficult to cover all the needs of deaf Catholic or other religious parishioners. If we are to try to find or recruit new ones, many would not accept due to many reasons - lack of knowledge of the religion, not willing to work on Saturdays/Sundays, lack of experiences in religious sign Language skills, no training, etc. I believe the creation of licensure for temporary religious interpreters would make it more difficult than beneficial for us deaf religious parishioners. Please do not pass the bill. Thank you for ur consideration.</p>
-	<p>While I agree that, in the broad, general field of interpreting, the main consideration is skill level/qualification of a practitioner for a particular assignment and consumer and, while I agree that religious settings deserve interpreters of the highest possible skill level, there are other factors to consider for religious interpreting. Most churches would like an interpreter who shares the faith of the church, synagogue, or mosque. Most churches (etc) would like to preserve their right to hire, whether volunteer or paid, certified or uncertified, the interpreter/s of their choice. Most churches would prefer to have interpreters who are familiar with the religious vocabulary and order of service of their particular faith or denomination. Not to mention the scarcity of religious interpreters as it is. Not to mention that ITPs do not generally prepare interpreters to work in religious settings. There are great interpreters who do not happen to have been specially trained or certified who have good skills and a heart for faith-based interpreting. Are you going to deny these folks from offering their services? Are you going to deny a religious institution the right to hire them?</p>
-	<p>Requiring religious interpreters to be licensed if they recieve payment is not a sustainable practice. Many churches don't offer interpreting for the deaf and hard of hearing because the cost of licensed interpreters is beyond their budget. Churches that pay small honorariums of \$25 or less do so out of appreciation for those of us who desire to extend the Gospel to an unchurched segme nt b of the population, but who aren't able to afford the formal education and certification the llicense requires. Applying this requirement to houses of worship will diminish the ability of churches to share the gospel with the Deaf community. The honorarium is just enough to purchase gas to get to church. Not a whole lot.</p> <p>This bill is hindering people who serve (volunteers) in churches. It is not right and I don't support.</p>
-	<p>If deaf persons attend a church service and there is no licensed interpreter or interpreter services, can someone who knows sign language , but is not licensed provide interpretation? Will licensing be required of hearing children of deaf parents when they are tasked to interpret for their parents?</p>
-	<p>How does the board get to decide and interject in religious settings? There is a separation of church and state that this board has decided to govern despite the original bill not addressing anything about religion but only medical, legal and educagtion. Deaf people are considered to be one of the most unchurched populations in the country and this regulation will mean that the pool of religious interpreters who are able to support Deaf people gaining access to soul saving teaching will be negatively impacted. Churches are not required by ADA law to provide interpretation and now you will make it impossible especially for smaller churches to meet the needs of the unchurched.</p>
-	<p>As a religious ASL interpreter for the past 6 years, I feel very comfortable in my role and have received very positive feedback from the Deaf participants I serve. If I had to become certified this would be a strain, financially and time wise. I could not even learn what I am already very familiar with (signing the Catholic mass) through secular interpreting classes. There is already a dearth of Catholic interpreters (and perhaps religious in general). What a great shame it would be if mandatory certification for religious interpreting occurs. Very few interpreters would be available, therefore negatively affecting the (Catholic) Deaf community, both spiritually and socially.</p>
-	<p>While I agree that, in the broad, general field of interpreting, the main consideration is skill level/qualification of a practitioner for a particular assignment and consumer and, while I agree that religious settings deserve interpreters of the highest possible skill level, there are other factors to consider for religious interpreting. Most churches would like an interpreter who shares the faith of the church, synagogue, or mosque. Most churches (etc) would like to preserve their right to hire, whether volunteer or paid, certified or uncertified, the interpreter/s of their choice. Most churches would prefer to have interpreters who are familiar with the religious vocabulary and order of service of their particular faith or denomination. Not to mention the scarcity of religious interpreters as it is. Not to mention that ITPs do not generally prepare interpreters to work in religious settings. There are great interpreters who do not happen to have been specially trained or certified who have good skills and a heart for faith-based interpreting. Are you going to deny these folks from offering their services? Are you going to deny a religious institution the right to hire them?</p>
-	<p>If deaf persons attend a church service and there is no licensed interpreter or interpreter services, can someone who knows sign language , but is not licensed provide interpretation? Will licensing be required of hearing children of deaf parents when they are tasked to interpret for their parents?</p>

[illegible]

Regulations	Concerns/Comments	Board's Suggestion
	<p>I would like to comment on the "Estimate of Economic Impact" at the beginning of 14.41.01 Licensing Requirements for Sign Language Interpreters.</p> <p>Under Item II Types of Economic Impact:</p> <p>The table shows \$144,179 net revenue for GDOHH but no revenue or expenses/benefits or costs for any of the other categories. There will, in fact, be significant expenses to interpreters, interpreting agencies, and the entities that pay for interpreting services (such as government offices, businesses, medical facilities, educational institutions, etc.)</p> <p>Rows B and C under Impacted Entity in the table should show an expenditure for the state agencies and local governments who hire interpreters. I anticipate that the costs of interpreters will go up (as explained below). State and local government offices such as those providing interpreters for their deaf employees and others such as schools with deaf students, health departments, social service agencies, etc. will likely have to pay higher fees to get interpreters.</p> <p>Row F Direct and indirect effects on public under Impacted Entity in the table should show a cost that represents what interpreters will pay to get licensure in Maryland. Interpreters are members of the public, so the fees that they are paying to get a license should be a cost in this item. For example, this table states that GDOHH anticipates revenue of \$144,179 net after fees and expenses have been deducted, then perhaps the actual amount collected might be \$180,000. Suppose, for example, that \$130,000 of this might come from the fees that interpreters pay to get a license and \$50,000 might come from the fees that interpreting agencies pay to be licensed. In that case \$130,000 should be shown as a cost in Row F. I am not sure if interpreter agencies are a "regulated" or "other" industry. So the \$50,000 that agencies are paying should be shown as a cost in row D or E of this table. (Those are example and not actual numbers, because I am not sure what numbers were used to calculate the \$144,179. GDOHH will have better information on which to calculate the costs that interpreters and agencies will be paying to get licensure.)</p> <p>But the cost of licensing fees is not the only cost to interpreters and agencies (more info is shown below). So the \$180,000 used in the example for amount of expenditures should be increased to the additional costs explained in the examples below.</p> <p>Under Estimate of Economic Impact, II. Assumptions, Economic Impact on Small Businesses, it says:</p> <p>"The proposed action has a meaningful economic impact on small businesses. An analysis of this economic impact follows: This could impact interpreter agencies and freelance interpreters."</p> <p>I disagree with saying "could impact". There will, in fact, be many increased costs to interpreter agencies, freelance interpreters, and also to the entities that pay for receiving interpreter services.</p> <p>There will be less interpreters working in Maryland. This will be due to unqualified interpreters being pushed out of the field (which is a good thing and which is the point of this law requiring licensure). However some skilled, certified, and experienced interpreters will also drop out of working in Maryland. In the Metropolitan DC area, some interpreters who live in DC or VA and only sometimes work in MD might decide that they can get enough freelance jobs in DC or VA and may decline commuting to assignments in Maryland because they do not want to get Maryland licenses. Some skilled, certified, and experienced interpreters who live and work in Maryland may decide to drop out of the field. Some interpreters in other states who are considering moving to Maryland might choose other states instead. So there will be less interpreters. Due to the law of supply and demand, less interpreters means that prices will go up. Interpreting agencies will have to pay more to attract skilled interpreters and they will pass on these costs to the customers who request services through them. Plus the interpreting agencies who have been intentionally hiring uncertified interpreters so they can pay them less will now have to pay more to get qualified interpreters. Interpreting agencies will have to pay more to get interpreters. Government offices, businesses, medical facilities, educational institutions, etc. that pay to get interpreters will have to pay more.</p> <p>Interpreter agencies will incur other costs too. Many agencies use automated, computer systems for receiving interpreting requests, scheduling, and record keeping. Their computer programs will have to be modified. They will have costs for training their office staff and for training new people who come on board and costs for making sure they are in compliance with the requirements of Maryland licensure.</p> <p>Freelance interpreters will have not only the licensing fees but also additional costs for obtaining CEU's. The registration fees and the time spent on getting a certain number of CEU's each year to maintain a license is different than the RID requirement of getting CEU's on a four year cycle. So interpreters will have increased costs each year. Some interpreters choose to save up to travel to national conferences where they can earn a bulk of the CEU's that they need for RID. They might earn just a few CEU's in one year and many the next year. So the CEU's required to maintain certification for RID are not the same as having annual CEU's for Maryland licensure. Also RID will lose money by having less people paying registration to attend their national conferences.</p> <p>Under Estimate of Economic Impact, III. Assumptions, Impact on Individuals with Disabilities, it says that Deaf, DeafBlind and Hard of Hearing individuals will be impacted, but it doesn't say what that impact will be.</p> <p>These individuals with disabilities will get better qualified interpreters by pushing out of the field unqualified and uncertified interpreters, but a shortage of interpreters will mean that some individuals will not receive the interpreting services that they request.</p>	