

Taskforce Alternative Pathways (AP) – Meeting #3 Notes

Date: June 3, 2026

Time: 7:30 PM – 8:00 PM

Zoom Link:

<https://us02web.zoom.us/j/86166967615?pwd=NqVXaWN5vcXTFaLFi86IKDQAOUTOZh.1>

Meeting ID: 861 6696 7615

Passcode: 902673

Attendance

- Caitlin Comstock
- Blaise Delahoussaye
- Jadalynn Orr
- James Skjeveland, SBSLI Member
- Sarah Yates
- Usherla DeBerry (GODHH Staff Support)

Absent

- Jimmy Beldon
- Tiasha Bera
- Jill Owens Brick
- Joshua Finkle
- Marylourdes Gayles
- Thomas Horejes
- April Jackson-Woodard
- Jacob Leffler, SBSLI Chair (Taskforce Lead)
- Jerri Seremeth

Agenda

1. Welcome & Introductions

Started meeting, stated names, included sign name for the record with physical description shared about appearance and background of screen. For each time before spoken, stated name.

Member Introductions

- **Caitlin Comstock** - hearing, interpreter, grew up around Deaf people and friends of Deaf and CODAs, lives in Frederick.
- Additional introductions were provided by taskforce members.

2. Taskforce Charge & Scope

- Review email from Jim. 3) I will break down my recommendations for meeting topics every 2 weeks to be as follows:
 - June 3rd: Purpose, Constraints and Definitions
 - June 17th: Competency Framework
 - July 1st: Evidence & Assessment Methods
 - July 15th: Pathway Structure
 - July 29th: Ethics, Accountability, and Safeguards
 - August 12th (Final Meeting): Finalization and Implementation Plan
- Topic for meeting Purpose, Constraints and Definitions.

3. Purpose

The purpose of creating **alternative pathways to licensure for sign language interpreters** is to ensure communication access while recognizing that competency can be demonstrated through multiple forms of education, training, experience, and assessment, not solely through one national examination/certification.

Key purposes include:

A. Address Interpreter Shortages

Many states, including Maryland, experience shortages of qualified interpreters, particularly in:

- Rural areas
- Specialized settings (mental health, DeafBlind, medical, legal, educational)
- Languages other than ASL, including tactile and protactile communication

Alternative pathways can help expand the pool of qualified professionals while maintaining standards for public protection.

B. Recognize Diverse Forms of Competence

Some interpreters have years of successful professional experience but may face barriers with standardized testing. Alternative pathways can acknowledge:

- Extensive work history
- Specialized certifications
- Educational achievements
- Mentorship and supervised practice
- Performance-based evaluations

This approach recognizes that interpreting competency may not always be reflected by a single test score.

C. Increase Workforce Diversity

Standardized exams have historically shown disparities in pass rates among candidates from different backgrounds. Alternative pathways can help create opportunities for:

- Interpreters from underrepresented communities
- Deaf interpreters
- Heritage signers
- Interpreters serving culturally and linguistically diverse populations

The goal is not to lower standards but to provide equitable methods for demonstrating competence.

D. Improve Access for Consumers

The ultimate purpose of interpreter licensure is to protect Deaf, DeafBlind, and Hard of Hearing consumers by ensuring access to qualified professionals. Alternative pathways can:

- Increase interpreter availability
- Reduce service delays
- Improve statewide access
- Support consumer choice

E. Support Professional Development

Alternative pathways can encourage interpreters to continue advancing their skills through:

- Continuing education
- Mentorship

- Supervised interpreting hours
- Specialty credentials
- Periodic competency reviews

F. Balance Public Protection and Workforce Needs

A well-designed alternative pathway should:

- Maintain high standards of practice
- Protect consumers from unqualified providers
- Provide a reasonable route to licensure for competent practitioners who cannot obtain a particular credential or pass a specific exam

Example Framework for Maryland

An alternative pathway could require:

- A minimum number of years of interpreting experience
- Completion of interpreter education or equivalent training
- Professional references
- Background checks
- Continuing education requirements
- Successful completion of a state-approved performance assessment
- Adherence to a code of professional conduct

In this model, the focus shifts from "Did the person pass one specific test?" to "Can the person demonstrate the knowledge, skills, ethics, and competency necessary to provide effective interpreting services in Maryland?"

For Maryland policymakers, the strongest justification is often that alternative pathways can increase communication access for Deaf, DeafBlind, and Hard of Hearing Marylanders while preserving consumer protections and professional standards.

4. Constraints

If Maryland were to create an alternative pathway to interpreter licensure, several constraints would need to be addressed to ensure the pathway remains credible, legally defensible, and protective of consumers.

A. Consumer Protection

The primary purpose of licensure is to protect Deaf, DeafBlind, and Hard of Hearing consumers.

Constraints include:

- Ensuring interpreters possess minimum competency standards.
- Preventing individuals with inadequate skills from obtaining licensure.
- Maintaining public confidence in the profession.
- Ensuring effective communication in high-risk settings such as healthcare, legal proceedings, education, and emergency services.

B. Objective Competency Measurement

A major challenge is determining how competency will be measured if not through a traditional certification exam.

Questions include:

- What evidence demonstrates competency?
- Who evaluates applicants?
- How are evaluations standardized?
- How is consistency maintained across applicants?

Without clear measures, the pathway may be challenged as subjective or arbitrary.

C. Legal and Regulatory Requirements

Maryland's licensure framework may be tied to existing statutes and regulations.

Constraints include:

- Existing laws governing interpreter licensure.
- Administrative requirements of the Maryland licensing board.
- Potential legislative changes needed to authorize alternative pathways.
- Compliance with state administrative procedures.

D. Resource and Administrative Capacity

Alternative pathways often require more administration than simply verifying a certification.

Potential constraints:

- Staff time to review applications.
- Costs of performance assessments.
- Development of evaluation criteria.
- Appeals processes.

- Ongoing monitoring and compliance.

E. Maintaining Professional Standards

There may be concerns from consumers, interpreters, educators, and professional organizations that an alternative pathway could be perceived as lowering standards.

Constraints include:

- Demonstrating that standards remain rigorous.
- Ensuring equivalency with traditional pathways.
- Preserving professional credibility.
- Maintaining trust within the Deaf community.

F. Workforce Supply vs. Quality Balance

Maryland may face interpreter shortages, but increasing the workforce cannot come at the expense of quality.

Decision-makers must balance:

- Access to services.
- Competency requirements.
- Geographic needs.
- Specialized interpreting needs.

G. Specialized Settings

An interpreter may be competent in some settings but not others.

For example:

- Community interpreting
- Medical interpreting
- Mental health interpreting
- Legal interpreting
- DeafBlind interpreting

An alternative pathway may need limitations, endorsements, or specialty requirements.

H. Equity and Fairness

The pathway must be fair to:

- Applicants pursuing traditional certifications.
- Experienced interpreters seeking alternative routes.
- Deaf interpreters.
- Consumers receiving services.

Questions include:

- Are requirements equitable?
- Are they accessible?
- Are they consistently applied?

I. Maryland Recognition

Many employers and agencies rely on nationally recognized credentials.

Constraints include:

- Portability across states.
- Employer acceptance.
- Reciprocity with other jurisdictions.
- Alignment with national best practices.

J. Stakeholders Buy-In/Acceptance

Any alternative pathway would likely require support and spreading awareness:

- Deaf community members
- DeafBlind community members
- Hard of Hearing community members
- Interpreter educators
- Licensed interpreters
- Employers
- State agencies
- The licensing board

A Practical Maryland Approach

Maryland alternative pathways:

- Documented professional experience.
- Formal training or interpreter education.
- Mentored practice hours.
- Ethics training.

- A performance-based assessment.
- Continuing education requirements.
- Consumer complaint and disciplinary oversight.

This approach addresses the central constraint: expanding access to qualified interpreters while preserving public trust and consumer protection.

5. Definitions

If you are discussing an **alternative pathway to interpreter licensure in Maryland**, it is helpful key terms:

Alternative Pathway to Licensure

A process that allows an applicant to demonstrate eligibility for licensure through approved combinations of education, training, professional experience, competency assessments, and other qualifications, rather than solely through a traditional certification examination.

Licensure

The authorization granted by the State of Maryland under GODDBHH and SBSLI permitting an individual to practice as a sign language interpreter under established professional standards and legal requirements.

Competency

The demonstrated knowledge, skills, judgment, ethics, and abilities necessary to provide effective, accurate, and culturally appropriate interpreting services.

Qualified Interpreter

An individual who has demonstrated the interpreting skills, ethical decision-making, language proficiency, and professional knowledge necessary to facilitate effective communication between Deaf, DeafBlind, Hard of Hearing, and hearing individuals.

Professional Experience

Documented work performed as a sign language interpreter in educational, community, healthcare, government, legal, employment, or other settings that contributes to the development of interpreting competence.

Performance Assessment

A structured evaluation in which an applicant demonstrates interpreting skills through live, recorded, or simulated interpreting tasks that are evaluated against established standards.

Mentored Practice

A supervised period during which an interpreter receives guidance, feedback, and evaluation from a qualified mentor to strengthen professional skills and competencies.

Continuing Education

Structured learning activities designed to maintain, improve, or expand professional knowledge, interpreting skills, ethical practices, and cultural competency.

Equivalency

The determination that an applicant's education, training, experience, or assessment results demonstrate a level of competency substantially comparable to established licensure requirements.

Deaf Interpreter (DI)

A Deaf, DeafBlind, or Hard of Hearing individual who has specialized training and expertise in providing interpreting services and who may work independently or in partnership with a hearing interpreter.

Communication Access

The provision of accommodations, services, and supports that enable individuals who are Deaf, DeafBlind, or Hard of Hearing to receive information and communicate effectively and equally.

Consumer Protection

Measures established to ensure that interpreting services are delivered by competent professionals and that individuals receiving services are protected from ineffective, unethical, or harmful practices.

Code of Professional Conduct

The ethical standards and professional responsibilities that govern interpreter behavior, decision-making, confidentiality, impartiality, professionalism, and accountability.

Workforce Shortage

A condition in which the number of qualified interpreters available is insufficient to meet the communication access needs of Deaf, DeafBlind, and Hard of Hearing individuals.

Reciprocity

A process by which Maryland recognizes interpreter qualifications or licenses issued by another state or jurisdiction that meets substantially equivalent standards.

Scope of Practice

The range of interpreting services, settings, and responsibilities that a licensed interpreter is authorized and qualified to perform.

Provisional License

A temporary license issued to an applicant who has met certain requirements but must complete additional education, supervision, mentorship, or assessments before obtaining full licensure.

Limited License

A license that authorizes practice only within specified settings, populations, or circumstances established by the licensing authority.

For a Maryland policy proposal, the most important definitions are usually:

1. Alternative Pathway to Licensure
2. Competency
3. Qualified Interpreter
4. Performance Assessment
5. Professional Experience
6. Consumer Protection
7. Provisional License
8. Equivalency

These definitions create the legal and regulatory foundation for any alternative licensure framework.

6. Identify Targets for Working Groups

- Define focus areas for subgroup work
- Assign or propose group topics

7. Next Steps & Closing

- Summarize decisions made during the meeting
- Next meeting topics: June 17th: Competency Framework, July 1st: Evidence & Assessment Methods, July 15th: Pathway Structure, July 29th: Ethics, Accountability, and Safeguards, August 12th (Final Meeting): Finalization and Implementation PlanConfirm action items
- Outline next steps

Meeting Cadence & Schedule

- **Next Meeting:** Wednesday, June 17 at 7:30 PM EST
- **Frequency:** Bi-weekly (every two weeks) thereafter
- Edits, format and duration to be confirmed as needed

Alternative Pathway to General Licensure Proposed by Sarah Yates:

The Alternative Pathway is intended to provide a route to general licensure for qualified interpreters who can demonstrate professional competency substantially equivalent to certification but who do not meet the requirements for licensure through traditional certification-based pathways.

This pathway recognizes that interpreting competency may be developed and demonstrated through a variety of means, including heritage language acquisition, lived experience, professional practice, education, training, mentorship, and community engagement. It is intended for experienced interpreters, including heritage signers and individuals whose interpreting skills were developed through family, community, cultural immersion, professional experience, or other nontraditional pathways.

Applicants seeking licensure through the Alternative Pathway must demonstrate competency in the areas of:

- Interpreting skills and performance
- Cultural competence
- Linguistic competence
- Professional ethics and conduct
- Relevant education and training
- Professional experience
- Community involvement and support, including input from Deaf consumers and the communities served

The Alternative Pathway acknowledges that some qualified interpreters may face barriers to obtaining certification or licensure through traditional routes, including financial constraints,

limited access to interpreter education programs, geographic isolation, certification testing barriers, historical lack of certification opportunities, or other factors. The pathway also recognizes the contributions of experienced interpreters who have demonstrated competency through years of successful practice, strong community reputation, and sustained service to Deaf, DeafBlind, and Hard of Hearing communities.

The Alternative Pathway is not intended to lower professional standards. Rather, it provides an alternative method for qualified individuals to demonstrate competency and eligibility for general licensure while maintaining consumer protection and communication access for Deaf, DeafBlind, and Hard of Hearing Marylanders.

One additional policy question your group may eventually need to answer is whether the pathway is intended primarily for:

1. **Legacy interpreters** (e.g., 15–30 years of experience, nearing retirement, no historical access to certification),
2. **Heritage signers/CODAs**, or
3. **Any applicant who can demonstrate equivalent competency.**

The broader the pathway, the more important it becomes to establish a rigorous competency assessment process.