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Interpreter Needs Assessment Report for the Louisiana Commission for the Deaf

March 1, 2023

GLOSSARY OF TERMS

Definitions are taken from the Council on Licensure, Enforcement, and Regulations unless otherwise noted.

ACCREDITATION: A formal process by which an authorized body assesses and recognizes an organization, a program, a group, or an individual as complying with requirements, such as standards or criteria.

ASSESSMENT PROGRAM: An evaluation, measurement, and document of the readiness, learning progress, skill acquisition, and/or educational needs of learners and professionals. Assessments provide learning goals, determine the appropriate settings for the learner to provide services, and identify the specialized support and resources that the learner can utilize toward achieving their professional goals. (Innivee Strategies)

CERTIFICATION: The procedure and action by which a duly authorized body evaluates and recognizes and/or certifies (International Organization for Standardization/International Electrotechnical Commission 17024, as cited in CLEAR) an individual, institution, or educational program as meeting predetermined requirements, such as standards (Joint Commission on Accreditation of Healthcare Organizations Lexicon, 1999, as cited in CLEAR).

CERTIFICATION PROGRAM - Designed to test the knowledge, skills, and abilities required to perform a particular job, and, upon successfully passing a certification exam, to represent a declaration of a particular individual's professional competence. In some professions, certification is a requirement for employment or practice (Institute of Credentialing Excellence ICE, n.d., n.d.).

COMPETENCE: Demonstrated ability to apply knowledge, skills abilities, and where relevant, demonstrated personal attributes as defined in the certification requirements.

CREDENTIALING: The voluntary or required process of assessing and validating the qualifications of a practitioner to provide services. It equally applies to programs, facilities, or products that have met established standards. Also, the administrative process of issuing specified credentials for purposes of authorizing practice of a profession.

DEAF INTERPRETER: A Deaf Interpreter is a specialist who provides interpreting, translation, and transliteration services in American Sign Language and other visual and tactual communication forms used by individuals who are Deaf, hard-of-hearing, and Deaf-Blind. As a Deaf person, the Deaf Interpreter starts with a distinct set of formative linguistic, cultural, and life experiences that enables nuanced comprehension and interaction in a wide range of visual language and communication forms influenced by region, culture, age, literacy, education, class, and physical, cognitive, and mental health. These experiences coupled with professional training give the Deaf interpreter the ability to effect successful communication across all types of interpreted interactions, both routine and high risk. (NIEC, 2023)

EDUCATIONAL INTERPRETER: Individuals who provide sign language interpreting services by facilitating communication within an instructional environment via an enhanced visual and/or tactile mode between and among deaf/hard of hearing and hearing students in situations in which those individuals are unable to communicate with one another using a speech and hearing mode. (Louisiana Department of Education, n.d.)

INCOMPETENCE: A lack of knowledge, skill, abilities, or judgment or disregard for the welfare of clients or other individuals of a nature or extent that demonstrates that the member is unfit to continue to carry out his or her professional responsibilities without corrective action.

INTERIM CERTIFICATE/INTERIM LICENSE: Certificate or license for an initial period of time pending completion of additional requirements, e.g. successfully writing an examination. Professional practice under an interim certificate/license may be subject to conditions.

INTERPRETER EDUCATION PROGRAM (IEP): A system of instruction and experience coordinated within an academic setting and leading to acquisition of the knowledge, skills, and attributes essential to the practice of professional interpreting at a specified degree level (associate's, baccalaureate, master's, doctorate). (CCIE, 2019)

LANGUAGE DEPRIVATION: A result of the lack of linguistic stimuli during the critical development period in early childhood. Language deprivation is especially common in deaf children, who frequently do not have full access to an accessible language (i.e. a signed language) early on in life. As a result, these individuals often do not develop full, fluent use of any language, and experience adverse life-long emotional, cognitive, and mental health issues. Generally, Certified Deaf Interpreters are utilized in interpreting scenarios where at least one participant is language deprived or demonstrates potential language deprivation. (Innivee Strategies)

LICENSURE (or REGISTRATION): The recognition of competence to practice a given occupation or profession conveyed to an individual or entity by a regulatory body. Individuals must complete various requirements prior to registration and become eligible to receive a license; they are held accountable for practicing in accordance with established standards of safety and effectiveness.

PRACTITIONER: A person who practices a specific occupation or profession.

PROFESSIONAL INTERPRETER: An interpreter who has attained a reputable, reliable, and valid certification from a professional association or similar entity. (Innivee Strategies)

QUALIFIED INTERPRETER: defined as an ASL interpreter who can legally provide services under the Americans with Disabilities Act (Innivee Strategies). An interpreter who, via a video remote interpreting (VRI) service or an on-site appearance, is able to interpret effectively, accurately, and impartially in both language directions, using any necessary specialized vocabulary (Louisiana, Definitions, 28 CFR § 35.104, 2016).

REGISTRATION: See "License." According to CLEAR, "registration" and "licensure" may be used interchangeably.

RECIPROCITY: An agreement between jurisdictions allowing practitioners from either jurisdiction to be recognized by the other without having to demonstrate any degree of competence. Licensure or assessment may or may not be required by the other jurisdiction.

STANDARDS OF PRACTICE: The rules, requirements, responsibilities and conditions that describe the minimal level of expected performance of a profession in the provision of safe, high quality services and against which actual performance can be compared.

TACTILE INTERPRETING: Tactile signing is a hand-over-hand method for people who receive signed information through touch. Tactile signing/interpreting utilizes ASL, which is a visually-based language. It should not be confused with ProTactile signing or interpretation, which is rooted in touch and practiced on the body.

1. Executive Summary

A. Purpose of Project

In 2021, the Louisiana Commission on the Deaf (LCD) developed a new mission and vision, new values, and a 2022-2024 strategic plan. One of the strategic plan goals states, “LCD will establish new systems and standards for American Sign Language (ASL) interpreting which define, describe, and incentivize new expectations for and oversight of the quality of ASL interpreters, including those in educational settings.”

As part of the commission’s pursuit of its strategic plan goal to establish ASL-English interpreter standards, the commission contracted with Innivee Strategies Inc. to gather data and make recommendations that would support the development of a sign language interpretation framework. This framework will consider oversight and regulatory policies and procedures, identify statewide data and best practices from other commissions of the d/Deaf, DeafBlind, and hard of hearing (per LCD’s naming conventions; also referred to as “deaf”), and gather information from the Louisiana deaf, ASL interpreter, agency, and hiring entity communities to recommend steps for the best path forward. This report is intended to guide LCD towards the identification of the needs, gaps, and challenges to develop a successful plan of action.

B. Key Observations & Recommendations

Focus groups were held and surveys distributed. Based on the initial findings, there is general consensus among the various constituents that ASL interpreter standards are greatly needed in the state of Louisiana to ensure safety, quality, and professionalism. The speed at which these standards are implemented will have an impact on the collaboration, relationship, quality of services provided, and oversight of the profession. This can be mitigated by a transitional plan sensitive to each constituent group’s needs and accompanied by frequent communication will minimize conflict and confusion. Joseph Tseng’s 1992 Model of Professionalization offers one such measured approach.

As a part of this gradual approach, the State of Louisiana and the Louisiana Commission of the Deaf are strongly encouraged to take legislative action to create an oversight authority and fund trainings and workshops for all affected groups; this will help strengthen professionalization and oversight, leading to greater enactment of consumers’ rights to equal access. Furthermore, the State and LCD are encouraged to enhance collaboration among key constituent groups, explore ways to increase interpreter pay, and expand the education of ASL and interpreting; these are currently the significant barriers ensuring adequate supply of professional interpreters.

Most importantly, it is critical that Louisiana allocate resources to construct necessary support systems in the form of interpreter education programs, professional associations, greater constituent understanding and awareness of the role of interpreters and their rights, and ethics in interpreting. This can be accomplished by creating an oversight authority composed of appropriate and diverse representation. This oversight authority will be responsible for making decisions and recommendations about the professionalization of interpreting to identify the appropriate steps toward eventual legislation of interpreter standards. The findings and recommendations are shared in this report.

2. Framework and Approach

The information in this report includes:

- An overview of the ASL-English interpreting profession;
- An examination of interpreting services in other states; and
- An assessment of current interpreting services in Louisiana and gaps in services.

To gather the data necessary to develop this report, Innivee Strategies:

1. **Conducted a review of current literature and information on the current market**, including interpreting services procedures in Louisiana, gaps in services, and interpreting services and standards in other states.
2. **Developed educational slides for focus group and survey participants based on this data** to give participants a better understanding of the goals and process of the assessment project along with the benefits and risks of each possible approach prior to their participation.
3. **Held six focus groups and distributed an online survey to constituents,** basing our questions about participants' experience with and expectations for interpreting oversight and regulatory approach off of the data collected on the current market.
4. **Analyzed the data** from our initial research, used the Tseng model of professionalization as our method of understanding/interpreting the data, identified themes and patterns in the data, looked for important outliers and trends, and derived recommendations from the information.

The focus groups, consisting of 29 participants, were held with the following communities within Louisiana:

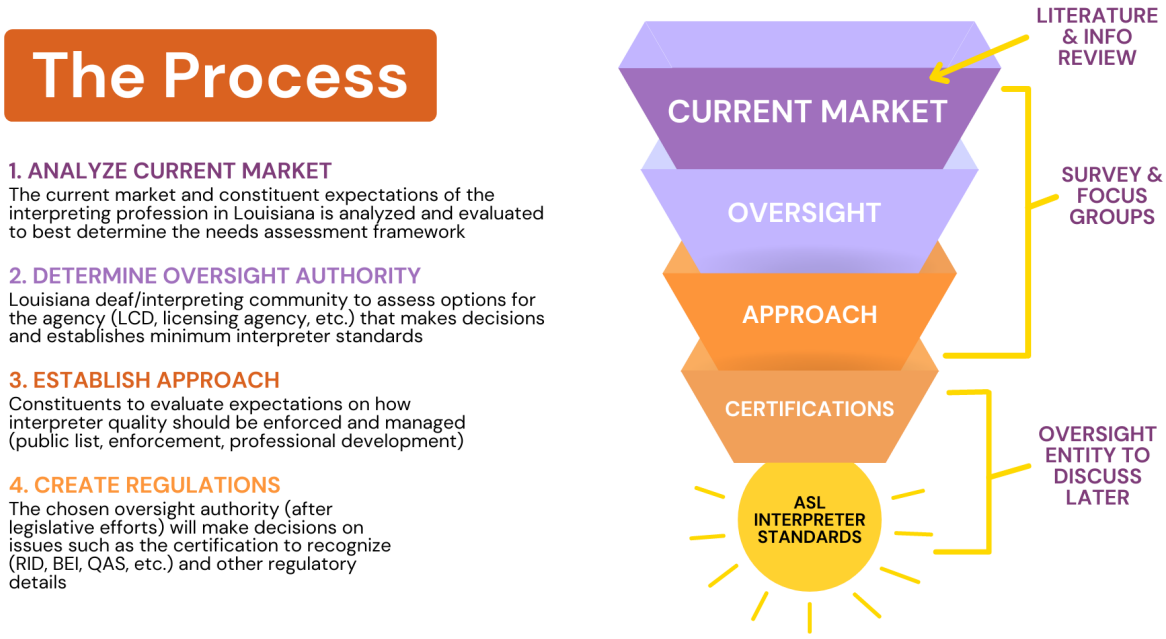
- ASL interpreters
- d/Deaf, DeafBlind, and hard of hearing community members who use ASL
- Entities seeking and paying for ASL interpreters, either directly or through agencies
- Agencies with employed and contracted ASL interpreters for hire
- IEP programs and interpreter trainers

Survey questions were provided in English and ASL; respondents, similarly, had the opportunity to respond to open-ended questions in English or ASL. All responses were guaranteed confidentiality. There were a total of 158 unique survey responses; 116 answered the survey in full. The survey was released and promoted by LCD through email, social media, the LCD website, and through LCD partner organizations, including Louisiana Registry of Interpreters for the Deaf (LRID) and the Louisiana Association of the Deaf (LAD).

An in-depth examination of certifications and similar assessments was not a focus for this data collection process. Rather, the intent of this report is to understand the first three levels, identified in Figure 1 below, to ensure that they are analyzed and understood. The findings point to a goal for an oversight authority, established through legislative efforts, to make decisions on the recognition of specific standards, assessments, and/or certifications (e.g. RID, BEI, QAS, etc.) and other regulatory details. It will be critical for this oversight authority to gather the necessary and current information to make decisions about the recognition of certain standards, assessments, and certifications.

Figure 1

The Process for the LCD Interpreter Needs Assessment



The 1992 Tseng Model of Professionalization (see Figures 2 and 3), developed by Dr. Joseph Tseng, was based on conference interpreting in Taiwan and a comprehensive review of the literature on professionalism. This report used the Tseng framework to analyze the data from the literature and information, shared with focus group/survey participants, and used to analyze the focus group/survey data and write this report.

A. Existing Studies on Statewide ASL Interpreting Standards

To date, Innivee Strategies identified research or studies specifically on Statewide ASL interpreting standards through internal studies or documentation commissioned by the following states:

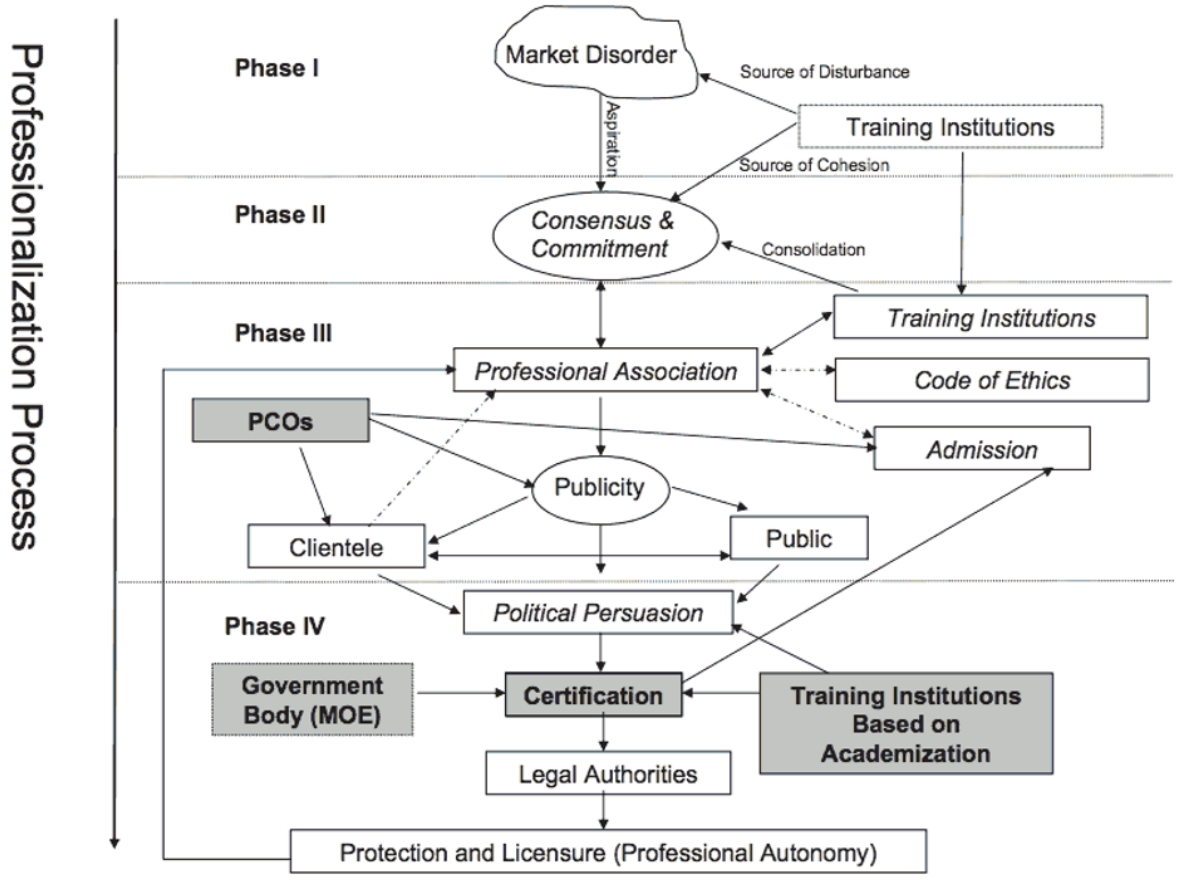
- Colorado: Interpreter Survey Results
- Hawaii: Status of State Licensure of American Sign Language Interpreters
- Maryland: Ways to Protect and Serve Users of Sign Language Interpreting
- Virginia: Study of the Need to Regulate Sign Language Interpreters

In 2018, the National Association of the Deaf (NAD) delegates approved a motion to include in its top five priorities: “Restoring the Deaf community's confidence in the sign language interpreting profession by strengthening our partnership with interpreters.” The motion’s goals included, “developing a position statement on the minimum standards for federal, state, local and institution-wide regulations and policies” and by the Orlando, Florida NAD conference in 2020 (postponed to Summer 2022 due to the pandemic) the following would be achieved, “publish its position statement on minimum standards for sign language interpreting on the NAD website along with supplemental information for state associations, non-profits, and other advocacy entities on the best strategies to support and implement these standards.” As of March 2023, the NAD has not provided a position statement on minimum standards for sign language interpreting at its website: https://www.nad.org/about-us/position-statements/.

B. The Tseng Model of Professionalization

Figure 2

The Professionalization of an Occupation (Tseng, 1992)



Tseng (1992) explored how the interpreting occupation can become professionalized, sharing a suggested model (Figure 2). He posited that four phases lead an occupation to a formal professional entity:

Phase 1: Market Disorder
Phase 2: Consensus & Commitment
Phase 3: Professional Association
Phase 4: Political Persuasion

Phase 1: Market Disorder is "characterized by bitter competition among practitioners" (Tseng, 1992, p. 44). Tseng continued,

> Practitioners in the market cannot keep outsiders from entering practice. They themselves may have started practice as outsiders. . . It is very likely that the public simply does not care about the quality of the services. Hence, distrust and misunderstanding permeate the market. What matters more to clients,

> in the absence of quality control, is usually price. . .When the clients need services, they simply call upon anyone who is around and asking a reasonable fee. Clients who demand quality services are usually troubled by the fact that they do not know where to get qualified practitioners for services. (pp. 44-45)

As a result, in **Phase 1**, qualified professionals often are not easily found, and have little to no incentive for specialized training. However, there are some who collectively discuss how to promote the field and improve market conditions. This leads to **Phase 2, Consensus & Commitment**.

With increased demand for supply,

> training institutions emerge depending on the scale of the demand. The more practitioners are needed, the more training institutions are likely to rise... training schools vary considerably in admission standards, duration of training, curricula and the qualifications of graduates and instructors. (Tseng, p. 46).

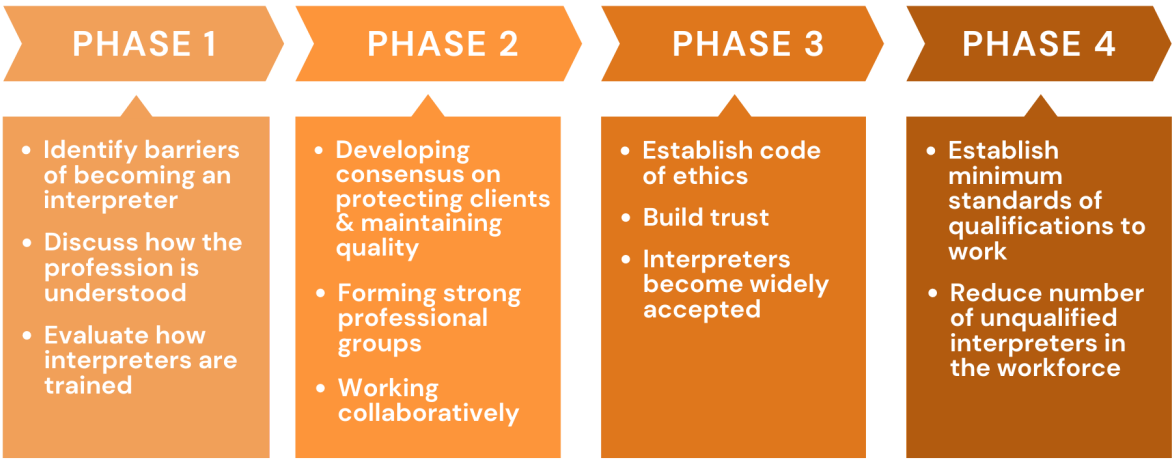
When programs begin competing for students, the market may become oversaturated with practitioners who may not necessarily be competent for the work they take. Many dissatisfactory results emerge, such as "insecurity, competition and the absence of quality control of the services. Elements such as public trust and professional code of ethics are almost non-existent at this stage" (Tseng, pp. 46-47). This leads to practitioners' desire for change to decrease the negative factors and to initiatives to gain greater control over the market in which they operate.

With this slow but important evolution from market disorder to some semblance of consensus and commitment (see Figure 3), **Phase 3, Professional Association** includes the emergence of professional organizations, collective work, and greater controls in place. **Phase 3** is when ethical standards often are created (Tseng, 1992) to earn public trust and internal control. Through professional organizations, such as the RID, legislative recognition, licensure, protection, and autonomy are all possible, laying the groundwork for **Phase 4: Political Persuasion**.

Tseng stressed that professionalization is a circular process, with each phase providing feedback and reinforcement to the previous phase. He also shared various obstacles to professionalization, such as confusion about roles, skepticism by public and legal authorities, and basic sociology. To overcome these obstacles, he advocated the development of a strong professional association that represents the majority of practitioners. Tseng noted that an association cannot be expected to fully realize its power if it only represents a portion of competent practitioners.

Figure 3

A Simplified Version of Tseng's 1992 Model



By and large, the industry built around ASL interpreting — including interpreter training programs, credentialing and membership organizations, codes of ethics, and state regulations — resembles the ones built around interpreting in other languages.

3. The American Sign Language Interpreting Profession

ASL is, relatively speaking, a young language. ASL became formalized in the early 1800s, although sign language had already been used for thousands of years before that. Modern-day ASL has evolved from a variety of signed languages, including French Sign Language, Martha Vineyard Sign Language, Indigenous Sign Language, American Indian Sign language, and others.

Today, as one of the most studied world languages in the United States, a steady supply of new ASL learners flocks to interpreter education programs (IEPs), usually after having taken two or three years of ASL classes. The language's popularity, along with increased media exposure, has helped to expand the number of individuals coming to ASL as a second language and potentially becoming sign language interpreters.

Initially, ASL interpreters were usually family members or friends of Deaf and hard of hearing ASL speakers and came to the profession already proficient in both ASL and English. In 1964, when the national Registry of Interpreters for the Deaf (RID) was formed, interpreting was on its way to becoming a profession. Along with that professionalization came benchmarks, standards, and expectations. As the ASL interpreting profession matured, it became clear that there was a need for standardization of minimum qualifications for interpreters to ensure that individuals working as interpreters had the necessary skills and proficiency to effectively facilitate communication between Deaf and hard of hearing individuals and individuals who did not know ASL.

In our analysis of the American Sign Language Interpreting Profession below, we investigate:

A. how ASL interpreting services are used;

B. how interpreters are educated and how to ensure a supply of interpreters;
C. how to determine what makes an interpreter qualified;
D. how to determine interpreter competency, including testing and who should conduct it;
E. how states prevent unqualified or unethical individuals from legally interpreting; and
F. what mechanism to form to collect community complaints and adjudicate them.

A. Use of ASL-English Interpreting Services

History and General Use

Interpreting generally involves an interpreter and two or more parties that do not share the same language. In the instance of ASL-English interpreting, the process can often involves an ASL interpreter, a d/Deaf or hard of hearing person who uses ASL, and either a non-signing (usually hearing) person or persons or with another hearing interpreter or Deaf interpreter in close-quarters, such as tactile ASL or tactile interpreting for a DeafBlind person. ASL interpreters can be Deaf or hearing.

Traditionally, ASL interpreting has been provided in person. In the 1990s,video relay service (VRS), a new form of telecommunications relay service covered by a fee levied on all telephone accounts, began to be tested. Previously, such relay services had only been available via TTYs or the Internet, but were cumbersome and not accessible to people whose native languages were signed.

Video remote interpreting (VRI) is an interpreting arrangement similar in function to VRS although not a telephone call by nature and typically paid for by private parties to interpret a virtual meeting. Because of the virtual nature of this arrangement, an interpreter working with a consumer in Louisiana may be interpreting from inside or outside of Louisiana. In another arrangement, an interpreter in Louisiana could interpret via VRI for someone either inside or outside of Louisiana. Unique arrangements like this can sometimes bring unintended issues to light, which is examined further in the section on **Reciprocity.**

In the early 2000s, VRS and VRI companies began hiring thousands of ASL interpreters across the country. Today, many interpreters work in the VRS and VRI industry, either at one of hundreds of call centers throughout the country, including in Louisiana, or from secure locations inside their homes.

Outside of VRS, interpreting services are typically obtained in two ways: directly through transactions with the interpreter or interpreters, or through an intermediary, typically an agency that receives a request for interpreting services and matches the consumer with an interpreter who they employ or contract with. While the traditional interpreting agency model exists for the ASL interpreting community, there is an increase in spoken language agencies with minimal understanding of the unique needs of the ASL community; this is explored further in the next section.

The availability of jobs at VRS and VRI companies competes with jobs for interpreters in the community, and the increase in demand of ASL interpreters due to the Americans with Disabilities Act (ADA), advancement of d/Deaf, DeafBlind, and hard of hearing professionals, growth in the diverse communication needs of d/Deaf, DeafBlind, and hard of hearing people. This has often led to a supply-and-demand issue where there are too

many jobs and too few interpreters. Although access has increased and improved in general for deaf people, it is critical to improve the supply of interpreters to keep up with growing demand.

Legal Considerations

At least two federal statutes, the Americans with Disabilities Act (ADA) and Section 504 of the 1973 Rehabilitation Act, impose legal requirements for what constitutes "qualified" sign language interpreters. In the eyes of these statutes, where the ASL-signing individual is concerned, they must be provided with "effective communication" – the same level of access provided to hearing members of the public.

The U.S. Department of Justice, under the direction of the U.S. Attorney General, enforces both statutes and writes regulations to implement them with public input. According to these regulations, a "qualified interpreter" is defined as:

> an interpreter who, via a video remote interpreting (VRI) service or an on-site appearance, is able to interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. (Definitions, 28 CFR § 35.104, 2016)

Where the United States focuses on qualified interpreters, the United Nations Convention on People with Disabilities states in Article 9, 1(e) on Accessibility:

> To provide forms of live assistance and intermediaries, including guides, readers and professional sign language interpreters, to facilitate accessibility to buildings and other facilities open to the public;

For the purpose of this report, a *qualified* interpreter is defined as an ASL interpreter who can legally provide services under the Americans with Disabilities Act, whereas a *professional* interpreter is an ASL interpreter who has attained a reputable, reliable, and valid certification from a professional association or similar entity.

Deaf Interpreters and Certified Deaf Interpreters

Deaf interpreters or, Certified Deaf Interpreters, CDIs are deaf or hard-of-hearing signers who have knowledge and understanding of deafness, the Deaf community, Deaf culture, and the interpreting process. DIs and CDIs typically work in conjunction with a hearing interpreter team member. This Deaf-Hearing interpreter team ensures that what is being spoken is conveyed to the Deaf consumer in a language or communication form that they can understand, and vice versa when it comes to conveying the Deaf consumer's message in the spoken language being used.

DIs and CDIs often work with consumers who:

- Are DeafBlind and require tactile interpretation;
- Use non-standard signs or gestures, otherwise known as "home signs," which are unique to a specific family unit, or those who have disabilities and therefore may have atypical sign language use;
- Use foreign signed languages, such as immigrants, refugees, or visitors to the US;
- Have minimal or limited communication skills; and,

- Use signs specific to a given ethnic group or region.

In recent years, Certified Deaf Interpreters have become much more visible on mainstream media; DIs and CDIs have frequently been engaged for emergency announcements and press releases given their ability to convey ASL in a way that is accessible to the broadest possible audience.

The Deaf Interpreting profession is increasingly supported via organizations programs and services designed to facilitate the growth of individual practitioners in the field. These organizations and resources include RID via its Certified Deaf Interpreter certification program , National Deaf Interpreter association of Deaf Interpreters, and NCIEC Deaf Interpreter website and resources including the NCIEC Deaf Interpreter Institute.

Interpreting Agencies that Provide ASL Interpreting

The scope of this project does not include the examination of the role and impact of ASL interpreter agencies nor the state standards for ASL interpreting or the quality of ASL interpreter services. However, the NAD has a project to accredit interpreter agencies offering ASL interpreting services. The goal of this project is to have interpreter agencies meet minimum standards defined through a partnership of Deaf community members, ASL interpreters, ASL interpreting agencies, and government and private entities that hire ASL interpreters. While there are certifications for individual ASL interpreters, there are no measures in place to hold interpreter agencies accountable to the communities they serve, including spoken language agencies that provide ASL interpreters. As of March 2023, the NAD website reports that NAD executive board members are drafting the job description for the project leader based on the standards developed by the Interpreting Referral Agency Credentials (IRAC) Taskforce.

The project hopes that eventually, after interpreting agencies voluntarily adopt the NAD accreditation and the underlying standards and systems become more robust, governments and private entities (e.g. businesses, hospitals, etc.) including potentially the Louisiana ASL interpreter standards will recognize and require the accreditation to hire interpreter agencies for contracts that provide ASL interpreter services.

B. Interpreter Education and Supply

Overview

As more and more individuals came to the interpreting profession in the 1960s and especially during the 1970s and 1980s, steps were taken to qualify individuals providing ASL interpreting services through certification, establishing a so-called “minimum” or baseline level of qualifications required in order to work as an interpreter, to varying degrees of success. A brief overview of the assessments available today for interpreter ability is provided in **Private Performance Examinations and Credentialing**, **Interpreter Testing**, and **State-Provided Performance Examinations and Credentialing**.

The complexity of ASL interpreting certification and qualifications is paralleled by the complexity of ASL. ASL is produced through five physical parameters: handshapes, the orientation of the palm, hand location, hand movements, and facial or mouth expressions. Adding to the complexity, ASL uses a grammatical structure

completely distinct from English and also has its own vocabulary that does not necessarily have equivalent words in English (Baker-Shenk & Cokely, 1980; Valli et al., 2005). On top of that, interpreters must master cultural competency, cross-cultural mediation, and many other aspects involved with navigating multiple cultures and languages. Success in ASL interpreting depends upon how well the language has been acquired, the type and length of interpreter training education received, attitude, adaptability, and participation in continuing education activities.

Achieving success in interpreting can be challenging, as investigated further in the section on **Interpreter Education, Training, and Supply.** Sign language interpretation is a vocation that requires an investment of years for language proficiency, which averages several years of ASL instruction and practice even before becoming an interpreter. Success in obtaining interpreter certification post-graduation correlates strongly with the interpreter education program's accreditation by the Commission on Collegiate Interpreter Education (CCIE) which evaluates programs to ascertain that they adhere to its standards which were recently updated in 2019 (http://www.ccie-accreditation.org/standards.html). Furthermore, certification of an ASL interpreter does not guarantee quality or accuracy; it only guarantees that the interpreter has met *minimum* benchmarks to work in the profession.

American Sign Language and Deaf Studies Courses

Proficiency in ASL alone does not qualify one to become an ASL interpreter, nor does familiarity with Deaf culture. ASL classes and Deaf Studies courses. ASL classes and courses are critical to the pipeline and future supply of ASL interpreters by introducing people to the language, culture, and ASL interpreting profession. Colleges and universities may also use ASL and/or Deaf Studies courses as a way to build toward a formalized interpreter education program. According to the Modern Language Association's Language Enrollment Database (http://apps.mla.org/flsurvey_search), ASL enrollment at US institutions of higher education has increased rapidly, growing by 37% nationwide from 2009 to 2016. As clearly shown by the Modern Language Association's data[1], Louisiana's higher education institutions have yet to fully capitalize on this trend, with 161 students enrolled in ASL classes in 2016 compared to other states.

Interpreter Education Programs (IEP)

Interpreter training programs, interpreter education programs, or interpreter preparation programs are "...formalized education program[s] with a dedicated curriculum that is offered through a college, university or technical school that prepares students for a career in the field of interpreting" (RID, n.d.) Along with the professionalization of interpreting, IEPs are crucial components to increasing and improving the quality of ASL interpreters in each state, and ensuring that standards are widespread. The state of Louisiana has only one IEP program that provides an ASL interpreter degree: a two-year program at Delgado Community College. Compare this to surrounding states similar in geographic location and population size, according to the RID IEP database (https://myaccount.rid.org/Public/Search/Organization.aspx) and as summarized in Figure 4 below:

[1] https://innivee.com/wp-content/uploads/2023/01/MLA-ASL-Language-Enrollment-Database-1990-2016.pdf

Figure 4

Comparison of Higher Education Interpreter Education Programs & ASL Courses Offered

State	Est. Population	IEP - Bachelor's	IEP - Associate	Institutions Offering ASL (2016)	Students Enrolled in ASL (2016)
Louisiana	4.6 million	None	1	5	161
Alabama	5 million	1	None	6	467
Arkansas	3 million	1	1	3	179
Mississippi	2.9 million	None	1	7	383
Missouri	6.2 million	2	1	13	1,610
Oklahoma	4 million	1	2	14	961
Tennessee	7 million	2	None	12	731

A high-level analysis of Figure 4 reveals that Louisiana could likely sustain more than one IEP program and aspire to establish a bachelor's degree program in the state. An oversight authority can provide guidance on the elements important for working with a university within the state to support a bachelor's-level IEP program. Enhancing the pipeline of new ASL interpreters not only enhances the availability of services for Deaf, DeafBlind, and hard of hearing people, but also contributes to the employment of Louisiana residents and helps reduce the shortage of interpreters.

Another quality assurance component is for IEP programs to obtain accreditation from the Commission on Collegiate Interpreter Education (CCIE; http://www.ccie-accreditation.org/), which promotes professionalism in the field of sign language interpreter education to ensure standards for quality education and better-prepared ASL interpreters entering the profession within a period of time after graduation. In addition, RID provides a general set of questions for individual interpreters considering an IEP that can also serve as a guide for developing a reputable and robust program. Questions include:

- Is the instructor native or near-native fluent in ASL?
- Is the instructor involved in the Deaf community and with professional organizations?
- Are you provided with information on what is happening in the Deaf community?
- Does the Deaf community support this class and organization?
- What has become of previous graduates of the class? (RID, n.d.)

Gender and Racial Representation Among Interpreters

Given the broad range of scenarios and settings in which a d/Deaf, DeafBlind, hard of hearing or hearing person may need an ASL interpreter, it is important that interpreters, then, reflect the demographics of the population being served. For instance, a male d/Deaf, DeafBlind, or hard of hearing patient would likely prefer a male ASL interpreter for an annual physical; a female d/Deaf, DeafBlind, or hard of hearing presenter might prefer a female, rather than male, when interpreting from ASL to spoken English. In the same vein, d/Deaf, DeafBlind, and hard of hearing persons of a specific race — especially those who are Black, Indigenous, and People of Color — may prefer an interpreter of the same race.

The majority of ASL interpreters in the nation are currently white women, as consistently reported in the RID annual reports available on its website. The same is true of IEP programs, student bodies, and classroom materials. According to RID's 2022 database, 5 out of 72 certified interpreters (7%) in Louisiana identify as BIPOC, which is significantly less than the Louisianan populace as a whole - of which 37.6% are non-white.

C. Determining Interpreting Quality

The Importance of Qualified Interpreters

Identifying a "not good" or unqualified interpreter is seldom easy for those who are not familiar with ASL or the ASL interpreter profession. Public mishaps televising unqualified interpreters often attract attention and scrutiny from the d/Deaf, DeafBlind, and hard of hearing community. In one example, a Florida signer who self-professed their proficiency in ASL was assigned to interpret a televised hurricane evacuation broadcast where he signed, as officials were warning residents to evacuate to higher ground: "Who low settle what flood. Nice" (The Weather Channel, 2017). He "signed" at two news conferences before solicitation of his services ceased.

Another example took place in Dallas County, Texas, where an interpreter appeared on screen for a press conference. While she would appear qualified to the untrained eye, d/Deaf, DeafBlind, and hard of hearing viewers reported being confused by what was being interpreted (The Daily Moth, 2020). The interpreter had been hired by a spoken language translation company that provided interpreting services for over 180 languages along with graphic and desktop design services. An investigation confirmed that this interpreter was not certified, and unqualified for this press conference.

Responses to these public examples of unqualified interpreters (or signers) have varied. The problem of the unqualified interpreters in these situations was able to be identified because of the public nature of the event and the relatively high number of viewers. In the vast majority of situations, individuals accept interpreting work without being qualified and they provide services out of the public eye or situations in which there are multiple individuals who are fluent in ASL are involved. The unqualified services have an adverse impact on d/Deaf, DeafBlind, and hard of hearing ASL signers who experience difficulty in communication across a wide swath of their daily lives: at work, at the doctor, at school, or when obtaining services from the government.

Such incidents are commonplace, and are the consequences of an absence of regulation of ASL interpreting often by hiring parties who are unqualified to evaluate the qualifications of ASL interpreters or by a lack of legislation. As with other credentialed fields, sign language interpreting requires an ability developed through a substantial investment of time to gain fluency.

The blatant disrespect for the profession and its end-users have far-reaching impact on d/Deaf, DeafBlind, and hard of hearing individuals: inability to find work or loss of work; potentially life-threatening medical miscommunication, language deprivation, and/or life-altering encounters with the police, in the court system[2], and in other spheres of life, many of which have led to well-publicized and not-so-publicized harm. To prevent individuals from taking interpreting jobs they are unqualified for, assessment of their ASL and English interpreting skills must occur.

Public Awareness about Interpreter Quality

Equally as important as training interpreters, there must be a form of training and raising awareness among d/Deaf, DeafBlind, and hard of hearing people and hiring parties about the complexities of the qualifying process, what their rights as consumers are, and how to advocate for quality services. All too often, deaf people have been indoctrinated that "better than nothing" is an acceptable measuring stick for interpreting quality, when in reality they should have full equity in communication access. The consequences of "better than nothing" could lead to errors that bring human toll and costs to all parties.

As commonly cited research states, more than 90-95% of d/Deaf, DeafBlind, and hard of hearing infants are born to "hearing" parents who likely have little to no knowledge of ASL, the interpreting process, or the Americans with Disabilities Act. Regardless of when people become deaf or hard of hearing, d/Deaf, DeafBlind, and hard of hearing people and their families are usually left to navigate unfamiliar communication processes, technologies, and accommodations, including interpreters. While the majority of interpreters go through formal education programs, d/Deaf, DeafBlind, and hard of hearing people rarely have this opportunity to be trained as consumers, and instead, must learn as they go.

In fact, d/Deaf, DeafBlind, and hard of hearing individuals typically have the *least* decision-making power within any interpreting scenario; for instance:

- Hiring entities such as doctor's offices, places of employment, and other entities that serve or work with deaf people generally contact agencies to request an interpreter, rather than ask the deaf person to recommend an interpreter for the job. The d/Deaf, DeafBlind, and hard of hearing person usually does not know who their interpreter is until they arrive; thus, they may find that the interpreter is not the right fit or unqualified, but feel pressured to accept what they can get.

[2] Arizona v. Natividad, 526 P.2d 730 (1974): *"The inability of a defendant to understand the proceedings would be [not only] fundamentally unfair but particularly inappropriate in a state where a significant minority of the population is burdened with the handicap of being unable to effectively communicate in our national language. A defendant's inability to spontaneously understand testimony being given would undoubtedly limit his [or her] attorney's effectiveness, especially on cross-examination. It would be as though a defendant were forced to observe the proceedings from a soundproof booth or seated out of hearing at the rear of the courtroom, being able to observe but not comprehend the criminal processes whereby the state had put his [or her] freedom in jeopardy. Such a trial comes close to being an invective against an insensible object, possibly infringing upon the accused's basic right to be present in the courtroom at every stage of his [or her] trial. (Lewis v. United States, 146 U.S. 370 (1892); Negron v. New York, 434 F.2d 386 (2d Cir. 1970))."*

- Interpreting agencies frequently seek the most cost-effective approach to interpreting, and as a result, may send an interpreter who is less qualified or less experienced rather than a qualified interpreter who may charge more per hour and reduce the agency's profit margin. A d/Deaf, DeafBlind, and hard of hearing person may not be told *which* agency is providing the interpreter, therefore making it more difficult to file a grievance if the interpreter they received was unqualified or unethical. Often these consumers are not in a position to work through the grievance process and that requires additional emotional labor on their part
- Interpreters who are hearing have the privilege of using their first language, which is typically English. Should they wish, or inadvertently do so, they can communicate directly with the hiring entity, agency, or hearing consumer, while the d/Deaf, DeafBlind, and hard of hearing person cannot. Generally, as the only person(s) in the room who know both languages (English and ASL), the interpreters are the only people who have full access to the conversation; neither the deaf consumer or hearing consumer can accurately vet the fidelity of what is being interpreted. Subsequently, interpreters are gatekeepers: they may unintentionally neglect to interpret a specific comment or interaction, or wilfully withhold specific information from one party or the other. If the d/Deaf, DeafBlind, and hard of hearing consumer is dissatisfied with the interpreter's service, they are put in the difficult position of having to choose between communicating this dissatisfaction through the same interpreter they are dissatisfied with, walking out, or tolerating the subpar interpreter until they can contact the agency or hiring entity (if they know which one) at a later date to express their dissatisfaction. Furthermore, while interpreters are ethically responsible to recuse themselves from situations that they are unqualified for, they may not wish to inconvenience the other parties or risk damaging their relationship with their agency, or may feel that they have an ethical obligation to provide a service rather than to provide no service.

A 2009 report commissioned by the National Consortium of Interpreter Education Centers (NCIEC), based on a nationwide bilingual English/ASL survey distributed to over 2,000 Deaf, DeafBlind and hard of hearing individuals who use ASL and interpreting services, had several key findings:

> The findings of this project strongly suggest there is a need and desire for deaf, deafblind and hard of hearing sign language users who use interpreting services to learn self-advocacy skills. Self-advocacy training needs to be offered in a mode that best fits the learning styles of sign language users who need access to interpreting services…
>
> It is recommended that self-advocacy training be provided to deaf community members who use interpreting services with consideration of offering it to adults who eventually will need sign language interpreting services. Such training needs be offered and available throughout the Country. A self-advocacy curriculum needs to be developed and used to ensure training consistency. Input, feedback, and suggestions for a curriculum should come from deaf community leaders, national and state organizations serving the deaf, state vocational rehabilitation offices, interpreting agencies, interpreter training programs, deaf community leaders, etc. (NCIEC, 2009, pp. 5-6)

Of 66% of d/Deaf, DeafBlind, and hard of hearing survey respondents to the NCIEC survey who worked with ASL interpreters once a week or more, less than 25% of them indicated that they advocate for themselves in

interpreting settings. Instilling d/Deaf, DeafBlind, and hard of hearing people with the knowledge, confidence, and training is critical not only for their access, but to uphold the quality of interpreters as a whole and to mitigate potentially damaging legal, medical, or other consequences.

D. Determining and Maintaining ASL Interpreter Competency

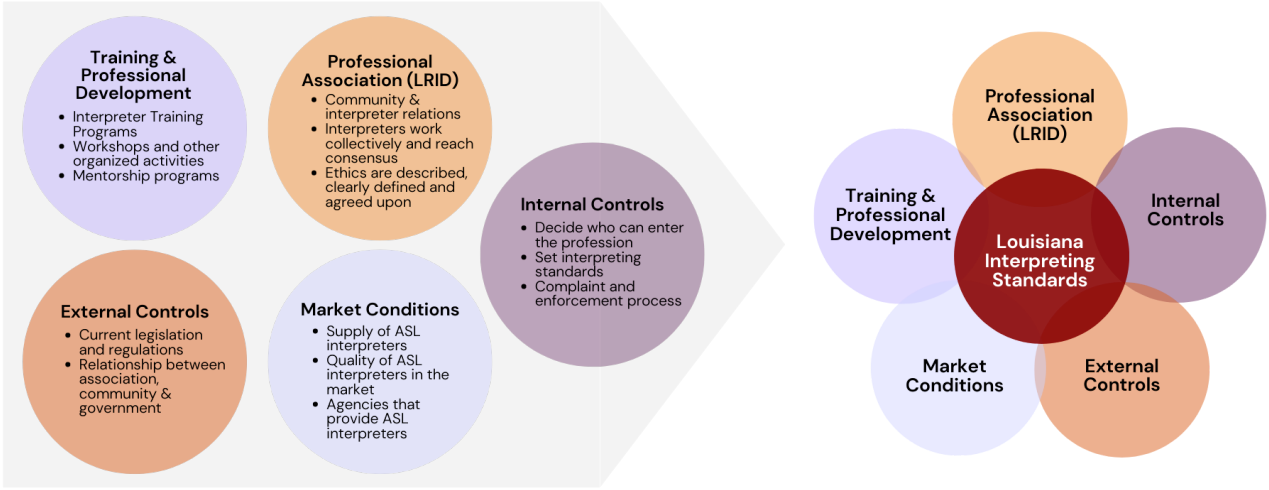
Key Components and Constituencies

Similar to how there are a number parties involved in any interpreting setting (hiring providers, agencies, deaf consumers, hearing consumers, and interpreters themselves), there are numerous components and constituencies that play a role in setting the foundation for, and upholding interpreting standards.

Figure 5 below identifies five areas — training and professional development, professional association(s), internal controls, external controls, and market conditions — that must be fully understood and invested into prior to the development of interpreting standards. The shift to Tseng's Phase 4, Political Persuasion, will only be successful once each of these components are robust and are in full alignment.

Figure 5

Constituencies and Components Involved with Determining Interpreting Standards



These five key components of the current market that, when defined and combined together, can establish interpreting standards.

Interpreting Specializations

The growth of the ASL interpreting field and increase of d/Deaf, DeafBlind, and hard of hearing professionals in the workforce has led to multiple specializations, including medical/mental healthcare, legal work, educational interpreting at the K-12 and/or post-secondary settings, and more.

A specialization requires interpreters to deepen their knowledge and competence in regards to the profession, technical vocabulary used, technologies used, and so on. As published in the Conference of Interpreter Trainers (CIT) *International Journal of Interpreter Education*:

> One of the central goals of specialization is to provide assurance to consumers that those claiming to hold specialist competence possess the requisite skills, knowledge, and credentials necessary to provide competent and reliable practice (Cheetham & Chivers, 2001; Lewis, 1989; MacDonald, 2002). Specialists possess expertise that exceeds the capacity of generalist practitioners. As a result, efforts of practitioners to specialize will benefit from the field's intentional development of standards for the practice and preparation of specialists. In conceiving such standards, ways in which specialization can be classified is one consideration. (Witter-Merithew & Nicodemus, 2010)

The CIT report further states:

> …by understanding the assumptions and core principles underlying interpreting practice, interpreter educators can establish curricula that will support the development of specialization in a way that prepares practitioners to more effectively apply decision latitude in light of the social conditions that support or limit professional autonomy. Finally, we suggest that without an orderly development of specialization and the ability of specialists to capture the unique patterns of practice that define specialization in interpreting, it is difficult—perhaps impossible—to protect the interest of consumers who rely on the services of interpreters with specialized competence.

Specialization needs oversight and control for each of the fields (e.g. legal, educational, medical, etc.). Each field may or may not have assessment and/or certifying bodies that may be considered for evaluating individual ASL interpreters for their skills within specific fields. RID and BEI have currently or previously offered specialist certifications for each of these fields.

States may offer assessments or certifications within their states for each specialization. For instance, the Administrative Office of the Court in a state may offer a legal interpreting certification. In addition, associations may offer specialized knowledge exams or performance exams in specialist areas of interpreting. For example within the medical profession there are two associations that offer language interpreting certifications, International Medical Interpreters Association (IMIA) and Certification Commission for Healthcare Interpreting (CCHI) which, as of this report, currently offer knowledge exams but do not offer ASL interpreting performance exams.

Interpreter Testing

In ASL interpreting, there are two general categories of testing available: performance examinations and certification programs offered by private entities, and performance examinations and credentialing offered by state governments or government agencies.

Generally, examination and credentialing programs offered by states can be further broken down into two categories: state- or private entity-provided written examinations and performance *assessments*, with a satisfactory outcome not necessarily sufficient to work as an ASL interpreter in the state, or state- or

private-entity provided written and performance examinations and *certifications*. Compared to assessments, certifications are broadly considered as sufficient qualifiers to recognize an ASL interpreter as a *professional* and thus permitted to provide services within the state.

To ensure that an individual's ability to interpret in ASL meets or exceeds a certain threshold, some form of testing is employed. Including the 17 states with some form of mandatory ASL interpreter licensing, 37 jurisdictions regulate sign language interpreting to some degree (Virginia Board for Professional and Occupational Regulation, 2019).[3] Most require certification to interpret in fields requiring specialized skills and knowledge, such as in the legal field, medical field, or in education (Izutsu et al., 2015). We could not find a single state that abstained from regulating ASL interpreting altogether. The states with the most "hands-off" regulations were Florida, Maryland, New York, and Vermont, where only ASL interpreters working in the legal setting were regulated at the state level.

Three private organizations provide or have provided national certifications or assessments for ASL interpreting that are currently recognized by states and private entities: the Registry of Interpreters for the Deaf (**RID**), the National Association of the Deaf (**NAD**), and BoysTown National Research Hospital (**Boys Town**). Forty-nine states, including Louisiana, recognize at least one of the certifications or assessments provided by these organizations.

Eleven states provide their own testing options (see Figure 8). Texas originated the Board of Evaluation for Interpreters (**BEI**) certification program, which it licenses to Wisconsin, Missouri, and Michigan. Three states (Akansas, Nebraska and Oklahoma) operate a version of the Quality Assurance Test (**QAST**) that was developed in the early 1980s. Virginia[4] and Hawaii[5] began offering their versions of a QAS in later years.

Factors to consider when reviewing possible examination options are the test age along with test reliability and validity which should be publicly available by the certification and assessment program for any state or user to review and evaluate. In addition, certifications and/or assessments can be evaluated for their quality using the Institute for Credentialing Excellence (ICE) National Commission for Certifying Agencies (NCCA) accreditation designed to support certification programs in achieving "optimal and comprehensive criteria for organizational process and performance." Accreditation by the NCCA by any ASL certification program provides an impartial, third-party validation that a certification program has met recognized national and international credentialing industry standards for development, implementation, and maintenance of certification programs. As of this report no credential or assessment in the ASL interpreting profession has attained NCCA accreditation.

Private Performance Examinations and Credentialing

The RID, NAD, BEI, and Boys Town entities have had active sign language interpreter credentialing programs in the last couple of decades.

[3] Since this report was published in 2019, South Carolina has joined the ranks of states requiring some form of interpreter licensing, with its licensing law signed on May 16, 2022.
[4] https://www.vddhh.virginia.gov/vqas.htm
[5] https://health.hawaii.gov/dcab/files/2020/08/HQAS-Application-1.pdf

Figure 6

Overview of Sign Language Interpreter Credentialing and Assessment Programs

Program	Purpose	How	Skills	Ethics	Evaluation	Cost
Registry of Interpreters for the Deaf	National certifying body	Interpreters take RID performance and written exams. State resources not needed.	Assesses minimum quality of skills	Assesses minimum standard of ethics	Certification depends on a passing score by human raters and written exam answers	Staffing cost to handle licensing and/or registration
Board for Evaluation of Interpreters	Texas certification program; can be leased to states	Purchase BEI license; states establishes operations, staffing, board, etc.	Assesses minimum quality of skills	Assesses minimum standard of ethics	Certification depends on a passing score by human raters and written exam answers	$700,000 in Texas; plus annual licensing fees vary. Staffing cost to handle licensing and/or registration
Quality Assurance Test	In-state assessment program; not a certifying body	Need to set up in-state program	Identifies strengths and weaknesses	Assessment of ethics depends on each state's QA test	Given a score by human raters and some states may have written exams	Assessment development funds and resources necessary to set up and operate program
Educational Interpreter Performance Assessment	Assesses educational interpreting; not a certifying body	Take EIPA performance and written exams through Boys Town. State resources not needed.	Identifies strengths and weaknesses	Assesses minimum standard of ethics unique to K-12 education	Given a score by human raters and written exam answers	Staffing cost to handle licensing and/or registration

Registry of Interpreters for the Deaf

RID was formed in 1964 and has offered written and performance examinations for ASL interpreter certifications. RID laid the groundwork for the professionalization of ASL interpreting by offering ASL examinations, credentialing, a code of professional conduct, continuing education, policy information, and other resources. The National Interpreter Certification (NIC) is their general sign language interpreting credential.

RID certifications as well as other private programs for interpreter performance examinations are accepted by many states as evidence of an individual's interpreting qualifications. As a professional organization for ASL interpreters, RID expects its members to abide by its code of professional conduct, and maintains an organizational apparatus to adjudicate complaints of improper conduct.

RID Certification Moratoriums

On August 4, 2015, RID placed the NIC alongside several specialist credentials, including the Certified Deaf Interpreter credential, on a moratorium without alternatives or replacements. Applications for credentials under moratorium were sunset in October of that year and two months later, the tests themselves also ceased.

In late 2016, RID formed a new organization, the Center for Assessment of Sign Language Interpretation (CASLI), that is responsible for testing. CASLI subsequently released a new generalist knowledge and performance exam for Deaf and hearing interpreters. The successful completion of the generalist knowledge exam is a prerequisite to the new NIC and CDI performance examination.

As of the writing of this report, the NIC and CDI examinations are no longer under moratorium.

National Association of the Deaf
Between the early 1990s and late 2002, the **NAD,** the nation's oldest civil rights organization, began offering its own generalist ASL interpreter certification program.Citing, among other reasons, the cost of developing a new test to maintain the validity of the certification, the NAD chose to cease its credentialing program in the early 2000s. RID in 2003 recognized interpreters holding NAD certifications, providing a pathway to maintain their certification through registering with RID (RID, n.d.).

Boys Town
Focusing on educational interpreter assessments, **Boys Town** offers the Educational Interpreter Performance Assessment (EIPA) written and performance tests. The performance test, according to Boys Town (n.d.):

> …is not limited to any one sign language or system. EIPA is used to evaluate interpreters who work with students who use predominantly American Sign Language (ASL), Manually-Coded English (MCE) and Pidgin Sign English (PSE).

EIPA is intended to assess interpreters who work in elementary and secondary schools and is generally accepted as an assessment of an educational interpreter's knowledge and skills. It is widely recognized among states, with approximately two-thirds requiring minimum EIPA assessment scores to interpret in the elementary and secondary school settings.

The Louisiana Department of Education[67] recognizes EIPA assessment pre-hiring screening or score as sufficient for inclusion in its educational interpreter/transliterator ancillary certificate application eligibility requirements for the following sign language educational interpreter certificates:

- Provisional Educational Interpreter Certificate
- Qualified Educational Interpreter Certificate

(Louisiana Department of Education, Ancillary Service Certificate Application (AS) - (Rev. 9/15/2022), n.d.).

State-Provided Performance Examinations and Credentialing

Where states provide the option of an "in-house" ASL interpreting performance examinations and credentials, two approaches dominate:

- The Board for Evaluation of Interpreters (BEI) ASL exam and certification (Texas Health and Human Services, n.d.), offered by Texas and leased to Wisconsin, Illinois, and Missouri; and
- Independently offered and administered tests (Arkansas, Hawaii, Nebraska, Oklahoma, Utah[8], and Virginia).

[6] https://www.teachlouisiana.net/teachers.aspx?PageID=12311129
[7] https://www.teachlouisiana.net/pdf/applications/educ_inter_trans.pdf
[8] Utah operates the more comprehensive Utah Interpreter Program.

Texas BEI

The BEI exam is provided by the Texas Office of Deaf and Hard of Hearing Services (DHHS). In Texas, individual exams are scored by their staff. Certificates are valid for only five years and holders must reapply near expiration to maintain the certificate; holders must pay an annual renewal fee and obtain ten continuing education units (CEUs) during each five-year certification term.

The BEI examination consists of an English proficiency test and an ASL and English interpreting performance test. Individuals who pass the examination are awarded a certification, with their examination performance corresponding to situations the certificate holder is allowed to interpret. In Texas, for instance, Basic certificate holders “meet minimum competency standards to interpret in K-12 and postsecondary settings” while Advanced certificate holders meet competency standards for “routine medical, public forums, government workforce, mental health and social service settings” (Texas BEI, 2022).

Master certificate holders cover “the most complex settings, including complex medical and mental health.” Holding the BEI Court Interpreter certificate is “required by law to interpret all proceedings of Texas courts, including county, municipal, and justice courts.”

BEI in Other States

Illinois, Michigan, Missouri, and Wisconsin license the BEI test from Texas and applicants in those states are administered the test by the the Illinois Deaf and Hard of Hearing Commission, Michigan Bureau of Community and Health Systems, Missouri Commission for the Deaf and Hard of Hearing, and Wisconsin Department of Health Services and Professional Services - Office of the Deaf and Hard of Hearing respectively.

In 2020, the Colorado Commission for the Deaf, Hard of Hearing, and DeafBlind contracted with Dr. Katrina Cue and Dr. Jon Henner to conduct research supporting the goal of determining “how to ensure a population of certified signed language interpreters for the deaf people of Colorado.” The report gathered opinions from various stakeholders, including the researchers’ own theories, and recommended that Colorado adapt the BEI as a certification alongside the RID certification.

The Louisiana Commission for the Deaf (n.d.) recognizes BEI certificates as sufficient for inclusion in its Registry of State-Approved Interpreters (Louisiana Bureau of Family Health, n.d.).

Independently Offered and Administered Assessments and/or Certifications

In the early 1980s, the Mid-America Quality Assurance Screening Test (QAST) was jointly developed and shared with a number of states including Arkansas, Iowa, Missouri, Nebraska, and Oklahoma, each of which independently operate their programs, some which are still offered today and some which have since been discontinued. Since that initial group of six states, Virginia, Hawaii, and Utah have developed and administer their own testing programs.

That QAST consists of a written assessment and a performance assessment. Individuals who pass both the written and performance portions are recognized for achieving a specific level of competency or performance based on a form of assessment developed by the state or that the state has outsourced to an external entity.

To dive into one specific example of a state QAST, the Virginia VQAS assessment is a state agency program provided by the VDDHH and assessments are performed by a remote panel. Virginia law requires that a 90% or better score is obtained on the Code of Ethics assessment (the written portion of the VQAS assessment) before becoming eligible to take the screening (the performance portion). Screening levels are valid for only three years and holders must retake the screening to maintain validity, a process of comparatively more screening and reminders of ethics requirements. Importantly, applicants' screening level arising from their performance on the assessment defines the work they are qualified for; a lower screening level indicates qualification for non-complicated interpreting work and a higher screening level indicates qualification for more complicated work such as educational interpreting. The VQAS state agency program is provided for assessment purposes only, helping interpreters identify strengths, weaknesses and areas for improvement while the state uses the assessment as a "workforce credential" (which is not a certification), particularly in Virginia Department of Education (VDOE) regulations for qualifying educational interpreters for employment.

In later years, Hawaii, Virginia and Utah began offering their own assessments, each implemented slightly differently from each other. Utah, for example, offers a comprehensive Utah Interpreter Program with written and performance components, alongside Utah interpreter certifications.

E. State Approaches to Preventing Unethical and/or Unqualified Practitioners

Overview

A 2007 article in the *Journal of Deaf Studies and Deaf Education* looked at 12 Deaf people and their experiences interacting with legal authorities through sign language interpreters. All 12 subjects preferred communicating through an interpreter, yet "in every case, these accommodations were problematic":

> ...accommodations involving sign language interpreters are not neutral and transparent and that they often have tangible effects on the experience and outcomes for Deaf people in the context of legal matters. Deaf people have very little control over the accommodation they receive and yet are held fully responsible for its efficacy. (Brunson, 2007)

More recently, a 2011 study showed that "interpreting in legal settings is not appropriate for all interpreters. As a specialization within the field, interpreting in legal contexts requires not only specialized, focused training but also unique vocabulary and skill sets" (Roberson 2011).

In another national survey of educational interpreters, "approximately one-quarter (23%) of respondents reported that they were hired to work as K-12 interpreters *prior to beginning* (emphasis added) their interpreter education" (Brunson, 2007).

From available evidence in addition to the above, it is clearly in the public interest to regulate ASL interpreting. Again, there is not a single state that abstains from regulating ASL interpreting altogether, whether it is via national certifications or state-level licensure. Furthermore, only four states regulate just one specialization of ASL interpreting (e.g. legal, medical, education, etc.). Overall, the trend is towards greater regulation and

oversight; several states, including Hawaii, Utah, Connecticut, and Colorado, have passed laws regarding ASL interpreting in recent years. More states have introduced legislation to regulate the profession, such as Maryland and Florida, and continue to introduce legislation at each legislative session.

In the Maryland Governor's Office of the Deaf and Hard of Hearing analysis of ASL interpreting in the state of Maryland and its legislative mandates and initiatives in September 1, 2020, 18 individual elements are identified as "essential to a successful interpreter policy":

1. Oversight by office or agency with appropriate cultural and linguistic competency
2. State permit to work for compensation
3. Licensing or registration
4. Minimum credentials for high risk or specialty settings
5. Enforcement procedures for handling complaints and violations
6. Scope of work covered
7. Reciprocity with other states
8. Waivers
9. Assessment of sign language interpreters
10. Professional ethical standards
11. Confidentiality requirements
12. Provision of list of licensed or, otherwise, approved interpreters for public use
13. Vendors of interpreting services
14. Provisional or alternative pathways to ensure diversity in the profession
15. Recognition of Certified Deaf Interpreters (CDI) as specialized professionals
16. Development of interpreting education programs and professional development opportunities
17. Regulatory flexibility
18. Scope of certifications

The states seeking to ensure a baseline of ASL interpreter competency do so through mechanisms such as recognizing private certifications, establishing state-run testing or skills assessment programs; enhancing consumer protections by proscribing individuals holding themselves out to be ASL interpreters without mandated credentials; and establishing state-run boards for a variety of purposes. Throughout this document, state ASL interpreter registries and state-provided ASL interpreter licensure are grouped together as regulatory regimes that are similar in many ways, from their goals to how they are implemented. Both share many finer points of implementation as well as the overall goal of regulating ASL interpreting, by granting individuals the right to practice ASL interpreting using criteria predetermined by the State.

The non-profit organization Council on Licensure, Enforcement and Regulation (CLEAR), the leading resource for professional regulation, defines licensure as:

> (a) process by which a governmental agency grants time- limited permission to an individual to engage in a given occupation after verifying that he or she has met predetermined and standardized criteria. This process generally takes into account education, experience, and examination.

> States define, by statute, the tasks/function/scope of practice and provide that these tasks may be legally performed by only those who are licensed.

The CLEAR website goes on to define “registration” as being interchangeable with the term “licensure”, which may be frustrating for those seeking a confident distinction between the two in how they are implemented. Perhaps the biggest difference in how the schemata are implemented lies in that licenses are something *received by* interpreters, and as such are something that they can also use out of state, at least where their license is recognized.

For example, after RID issued moratoriums on its interpreting certification programs, individuals seeking alternatives to proving their skill as ASL interpreters set their eyes on alternatives including private and state assessment and certifications. States offering the BEI, like Texas, began seeing an influx of applicants from out of state who were willing to travel to take their examination. Virginia, though their VQAS is an assessment and not a certification, also saw an increase in applicants from out-of-state from individuals looking for documentation of interpreting ability and skill.

In contrast, an individual holding a *license* to interpret in their “originating” state will have a hard time using that license to obtain work in other states, unless the other states in question have reciprocity agreements that legally recognize the license issued by the individual’s originating state, and in doing so, permit the individual to work within the borders of states recognizing the originating state certification. These mechanisms, called **reciprocity agreements,** are examined further in Section 4.

The data on how states have implemented ASL interpreting regulation further complicates matters in creating distinctions between the two definitions. States with licensure and registration schema share many of the finer points of implementation, such as a testing requirement, an education requirement, the regulation of specific interpreting settings, to fines and/or criminal penalties for holding oneself out as, or working as, an ASL interpreter without the required credentials. As such, it may be unproductive to dwell one whether to choose to proceed with a “licensure” schema or a “registry” given the many shared as well as differing details in how both are implemented and to break down the regulation of ASL interpreting into the smaller regulatory pieces reviewed throughout this document:

- Interpreter education and training requirements, including for continuing education;
- Interpreter testing requirements, whether through private organization certifications or through the state’s own testing;
- Application costs, renewal cycles, and associated maintenance fees;
- Beyond general community interpreting regulations, such as requiring advanced skills in certain specialties;
- Whether to maintain a public list of ASL interpreters meeting the State’s criteria to do business within the State;
- Whether to establish a grievance process to establish a legal mechanism to prevent unethical or abusive practitioners;
- In what manner ASL interpreter credentials awarded by other states are recognized in terms of granting out of state individuals permission to work as an ASL interpreter; and

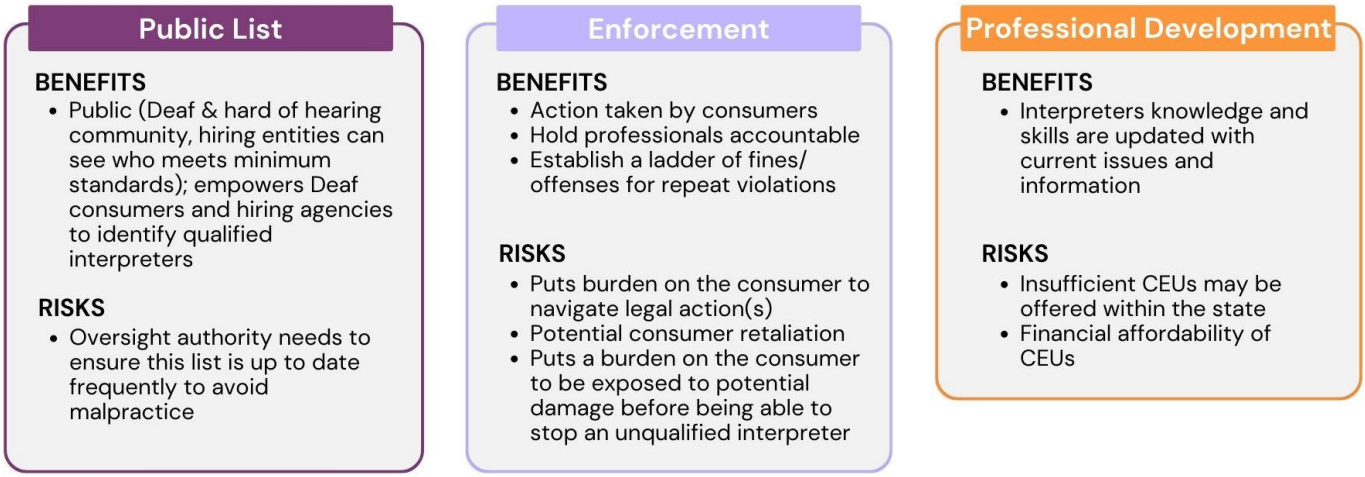
- Whether and to what degree penalties should be proscribed for individuals holding themselves out as ASL interpreters or working as ASL interpreters without being granted authorization to do so by the State.

Regulatory Approaches

Three mechanisms have been commonly utilized to regulate the ASL profession, each with its own benefits and risks.

Figure 7

Benefits and Risks of Regulatory Approaches

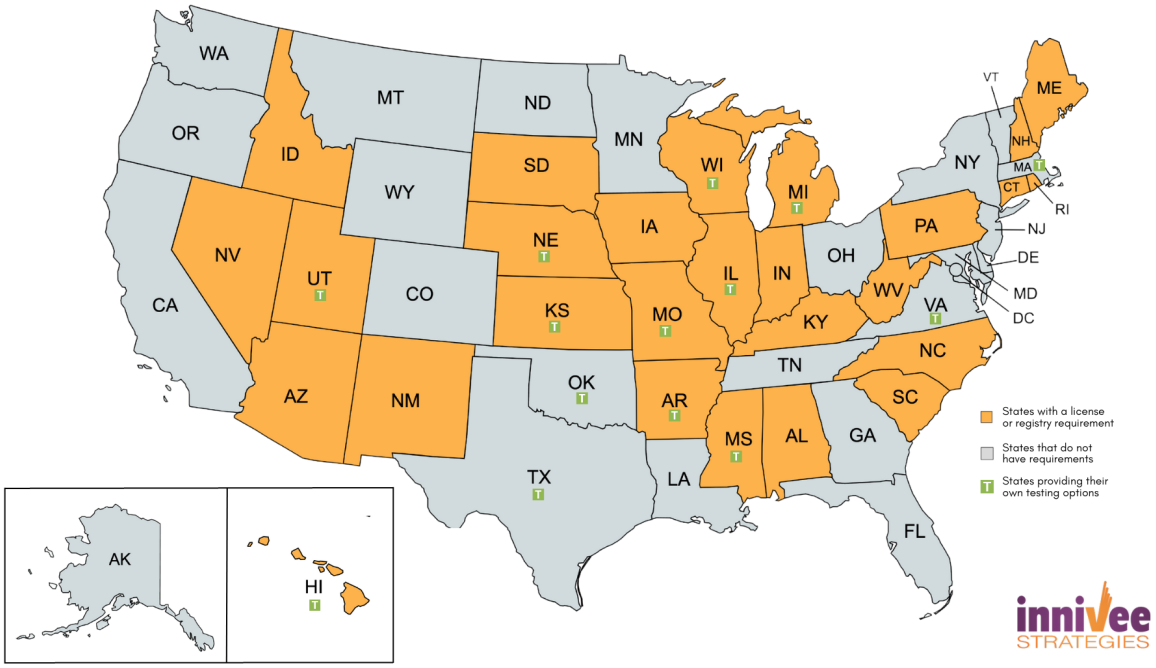


State-by-State Regulatory Approaches

Below is a high-level breakdown of how states approach the regulation of ASL interpreting:

Figure 8

State-by-State Approaches to Regulating American Sign Language Interpreting

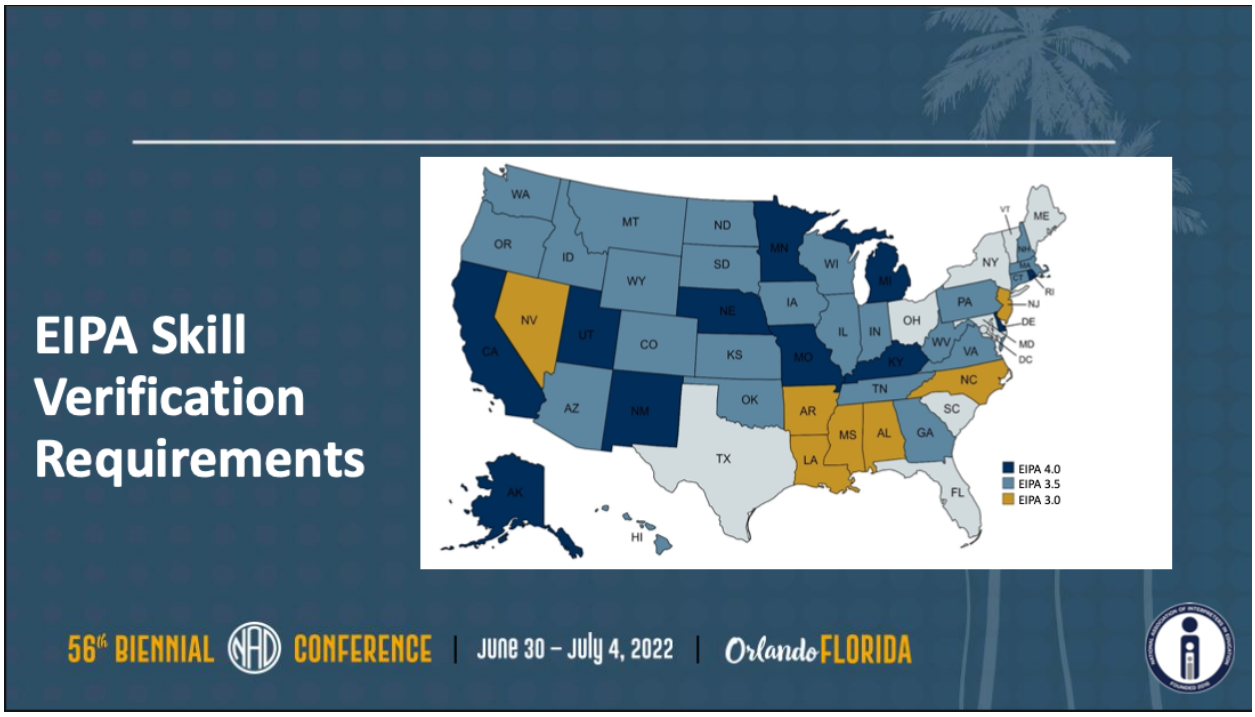


As shown in Figure 8:

- Thirteen states provide their own ASL interpreting performance tests or skills assessments.
- Twenty-seven states require a license to work as an ASL interpreter, or maintain a registry of ASL interpreters authorized to work in the state.
- Twenty-three states do not require any form of licensure or registration to work as an ASL interpreter in the state.

Figure 9

State-by-State EIPA Assessment Requirements



(Source: National Association of Interpreters in Education, NAIE, presentation at the 2022 Biennial NAD Conference in Orlando, Florida. Up-to-date information is available at: https://naiedu.org/state-standards/).

As shown in Figure 9:

- Eleven states require an EIPA assessment score of 4.0 or higher.
- Twenty-four states require an EIPA assessment score of 3.5 or higher.
- Seven states require an EIPA assessment score of 3.0 or higher.
- Nine states do not require an EIPA assessment score.

“Registration” and “Licensure”

Across state mechanisms for regulating ASL interpreting, two are common: interpreter “registration” and interpreter “licensure.” Registration and licensure schemata both provide states with a process for granting individuals the right to practice as an ASL interpreter. In both schemes, the process can involve measurements of competency and granting authorization to work in schools, courts, hospitals, and so forth, based on skill level.

Application fees can be imposed and renewal of authorization to work — whether a license or inclusion on a statewide registry — may be periodically required. The two schemata also, in states where they are implemented, sometimes share grievance processes similar in the imposition of fines on individuals working as

an ASL interpreter without prior authorization, and/or a grievance process whereby community members can lodge formal complaints against working interpreters for violating professional ethics.

Still, both schemata are defined and implemented differently by states. For example, Virginia defines registration as a process requiring only that an individual "file his name, location, and possibly background information with the State" (Virginia Board of Professional and Occupational Regulation, 2019, p. 7).

Private Right of Action

One approach to regulating interpreting is by criminalizing the act of presenting oneself as an ASL interpreter without holding an RID or another recognized certification.

The State of Colorado amended its Consumer Protection Act in 2020 to make it a deceptive trade practice to claim:

> to be a 'sign language interpreter', 'interpreter for the deaf'..., unless the person holds…
>
> (A) A currently valid certification issued by the Registry of Interpreters for the Deaf, Inc., or a successor entity; or
>
> (B) Any currently valid certification for sign language interpretation that is approved by the Colorado commission for the deaf, hard of hearing, and deafblind.

Colorado established a private right of action to allow civil action against those claiming to be a qualified interpreter without corresponding credentials. In other words, an individual could be in legal jeopardy for claiming to be an interpreter without appropriate credentials. To avoid legal jeopardy, an individual who does not hold such a certificate would need to disclose that fact to interested and hiring parties.

Sign language interpreting agencies, which typically contract with a large pool of sign language interpreters and place them on assignments, aren't exempt from Colorado's Consumer Protection Act. In a 2015 lawsuit covered by the *Colorado Independent*, four individuals sued a Colorado interpreting agency for, apparently as a common practice, sending individuals to assignments while presenting them as sign language interpreters in violation of the statute (Runge v. A&A Language LLC, 2015). The lawsuit was eventually settled, with the agency agreeing to only hire credentialed ASL interpreters.

Reciprocity

Some states, more than others, have a high number of interpreters working from out of state. When both an interpreter's home state and the state in which they work both have differing regulatory schema, the interpreter may need to undergo two separate testing and certification processes to become eligible to work in both states, unless the states recognize the credential the other provides.

The process of recognizing credentials provided by other states is called **reciprocity** and is common in many fields, including trades typically requiring a license to work such as plumbing, electrical repair, or real estate.

Reciprocity agreements are typically structured to name the specific state credentials that are recognized. For instance, some states specifically recognize the Texas BEI (which is also licensed for use by Illinois, Michigan, Missouri, and Wisconsin) as valid proof of competence to work as an ASL interpreter. Individuals seeking to

use their license in a state other than the one that awarded the license will still need to submit an application to have the license in question recognized, and pay associated fees; the benefit of reciprocity consequently presents as a waiver from having to re-test in addition to applying and paying fees.

Louisiana has no mechanism for ASL interpreter reciprocity at this time, but does offer reciprocity for other professions. For instance, Louisiana offers reciprocity for individuals holding electrical licenses awarded by 13 states. The Louisiana State Licensing Board for Contractors maintains information regarding licenses that are recognized, and lists of applicants from out-of-state seeking to have their licenses recognized, and applicants from in-state applying for licenses from out-of-state using their Louisiana credentials (Louisiana State Licensing Board for Contractors, n.d.).

Challenges in Credentialing

As covered in **Interpreter Testing**, the RID performance examination moratorium, which began in October 2015 and closing the application process for the NIC, CDI, SC:L, and OTC and later the examinations themselves two months later, posed issues for states allowing individuals to work within state borders as ASL interpreters, requiring only that they hold an appropriate RID certification.

When these RID certifications ceased to be offered after 2016, ASL interpreting students and others without an RID certification no longer had a mechanism by which to obtain one. Wisconsin responded by exploring other testing options that ultimately led to the decision to lease the BEI from Texas. In other states, certifications *other* than those issued by RID and affected by the moratorium were recognized. ASL interpreters in some states that had not yet taken action in response to the RID moratorium were forced to travel to other states to obtain a different certification such as the BEI.

In its analysis, Maryland noted that:

> …there are alternatives to assessing interpreting skills that do not rest solely on RID's certification. The RID certification, however, is the sole national accreditation widely depended upon across most, if not all, states in the country. *Alternatives include the licensing of BEI from the state of Texas or the development of a state QAS***.** (emphasis added)

The cost of licensing the BEI examination from Texas is reportedly approximately $14,000 per year, but scales with state population size. By comparison, the BEI exam cost the state of Texas approximately $700,000 to establish. Because of the significant up-front cost difference to developing an examination vis-a-vis licensing one already developed, it should be determined whether there is a need for a new test. Is there a significant difference in how ASL is used in Louisiana compared with other states? Should ASL interpreters in Louisiana be expected to be familiar with variations of sign language unique to the state or its demographics? Answers to these types of questions can help inform the appropriate policy for Louisiana.

F. Community Complaint Mechanisms

To protect members of the public, both hearing and ASL-speaking, from unethical interpreters, many states rely on the RID Code of Professional Conduct (CPC) to form a baseline by which appropriate behavior can be measured. As Tseng points out,

> The enforcement of the code of ethics is crucial, because it functions externally as one of the bargaining chips to earn public trust and internally as an indispensable tool for internal control. (Ref. 5, p. 49)

The RID CPC tenets are:

1. Interpreters adhere to standards of confidential communication.
2. Interpreters possess the professional skills and knowledge required for the specific interpreting situation.
3. Interpreters conduct themselves in a manner appropriate to the specific interpreting situation.
4. Interpreters demonstrate respect for consumers.
5. Interpreters demonstrate respect for colleagues, interns, and students of the profession.
6. Interpreters maintain ethical business practices.
7. Interpreters engage in professional development. (RID, n.d.)

The RID CPC is maintained through its Ethical Practices System (EPS), which is currently undergoing an overhaul to upgrade its mediation system, backlog of complaints, and enforcement. Furthermore, the EPS is only for RID members, so if an interpreter does not have membership or certification through RID, the EPS is powerless.

To enforce state regulations, responsibility is usually delegated to either a state agency or a board composed of appointed individuals, which then determines the manner for receiving complaints from members of the community and the process for adjudicating these complaints. For those found to be guilty of unethical acts, penalties can include fines, jail time, and/or the loss of the right to work as an interpreter within state borders. However, many states do not have firm penalties for those found guilty of committing violations, beyond the issuance of letters of warning.

4. Survey & Focus Group Results

A. Greatest Challenges to Advancing Interpreting Standards

Participants (n=60) were asked to identify and prioritize the greatest challenge to advancing interpreting standards. The most commonly agreed upon answer among all of the focus groups and surveys was:

1. Insufficient interpreting training and mentorship
2. Supply and retention of interpreters
3. Enforcement of interpreting quality
4. Insufficient salary for interpreters

The breakdown and prioritization of challenges according to each group was:

ASL INTERPRETERS	**DEAF, DEAFBLIND, HARD OF HEARING**

1. Insufficient interpreting training/mentorship 2. Insufficient salary for interpreters 3. Enforcement of interpreting quality 4. Supply and retention of interpreters	1. Insufficient interpreting training/mentorship 2. Supply and retention of interpreters 3. Enforcement of interpreting quality
HIRING ENTITIES 1. Insufficient interpreting training/mentorship 2. Supply and retention of interpreters 3. Enforcement of interpreting quality	**INTERPRETING AGENCIES** 1. Supply and retention of interpreters 2. Insufficient interpreting training/mentorship 3. Enforcement of interpreting quality 4. Insufficient salary for interpreters

B. Perspectives on Oversight Authority and Approach

General Oversight

Around 42% of survey participants wanted the Louisiana Commission of the Deaf (LCD) to serve as the oversight authority, with a licensing agency within the state government trailing at 25%. Over 80% of survey participants thought it was moderately/very important that the oversight authority group be independent from government and/or agency oversight in part to reduce bias in its decision-making process.

Impartiality and the absence of bias was very important to all participants. A concern was that LCD has experienced frequent turnover in its leadership and within the agency that oversees LCD. Concern was also expressed about where power over decisions that directly affect LCD, and in turn the d/Deaf, DeafBlind, and hard of hearing community would be held amid unpredictable leadership and oversight. State agencies (other than LCD) were perceived to have no knowledge about the interpreting profession and the deaf community. While LCD possesses knowledge and culture of the community's language and the interpreting profession through its oversight authority and inclusion of Deaf and hard of hearing and ASL-fluent staff, many agreed that LCD should have a special, designated group or entity with appropriate representatives at the table to spearhead the ASL interpreter oversight and regulations. There was also consensus that LCD and the committee should act in partnership with a state licensing agency who are experts in maintaining licensing. Some shared that it should be discussed whether the state licensing agency could be responsible for administrative functions while leaving the oversight of the profession to the delegated group or entity.

Some focus group participants pointed to the professionalization of the speech/language/audiology profession in Louisiana as a model that the ASL interpreting profession could replicate (ASHA, n.d.). The participants also suggested a similar approach for the approach to the sign language interpreting oversight authority legislative process, structure, and standards in Louisiana. Per the participants' understanding, the state uses national standards as a baseline for the speech/language/audiology and tailors these standards to be state-specific per the community's needs. Focus group participants also shared how the audiology profession advocated for a legislative bill that established an oversight authority through a board and outlined the process of its formation. According to the participants, this board was set under a state agency solely for support and resources.

Louisiana Oversight of Educational Interpreters

Among interpreters surveyed, 50% were not certified. However, nearly 70% of the uncertified interpreters reported they often worked in K-12 education settings where they serve as language models for deaf and hard of hearing children.

Educational interpreters are currently under the oversight of the Louisiana Department of Education. Focus group participants shared that regardless of the current guideline that expects an educational interpreter to have a minimum EIPA score of 3.0, the DOE does not implement or enforce it. The DOE does not currently have a coordinator dedicated to deaf/hh/db education/accessibility (which several said the DOE previously had, who was effective in their role at the time, but the person is no longer in their role), nor do they have the knowledge of or involvement in Deaf education. A consistent and persistent theme across community groups took a strong position that educational interpreter standards should not be under DOE, and it was generally acceptable for educational interpreters to be under the same oversight authority for community interpreters.

Louisiana Oversight of Legal Interpreters

The Louisiana Office of Language Access provides oversight of ASL interpreters in legal settings. Their expectations for ASL interpreters are currently outlined as follows:

> In Louisiana, a court interpreter is listed as “registered” in the language for which he tested if the interpreter: completes a two day training course, passes a standard written English examination as provided by the National Center for State Courts, passes a written translation examination, agrees to be bound by Part G, Section 14 of the General Administrative Rules for all Louisiana Courts: The Code of Professional Responsibility for Language Interpreters, and passes a criminal background check.
>
> American Sign Language interpreters are not required to take the written translation examination, but instead shall provide proof of a valid Specialist Certificate Legal (SC:L) or a national generalist certificate from the Registry of Interpreters for the Deaf (RID). (https://www.lasc.org/Language_Access#InterpreterRegistry, n.d.)

Oversight Authority Composition

Eighty-five percent of survey respondents stated it was moderately/very important to include decision makers with expertise in ASL interpreting, as well as Deaf, DeafBlind, and hard of hearing decision makers (80%), K-12 educational interpreting experts (76%), and experts in licensure and regulations (75%). Focus group participants were consistent in emphasizing the importance of including experts from different speciality certificates, educational interpreters, IEP coordinators, new interpreters, interpreting agencies, etc. to ensure a fair representation from different groups at the table.

Oversight Authority Functions

Generally, focus groups agreed that the new oversight authority should handle major functions (licensure, training, research, grievance), while the state licensing agency should handle administrative paperwork. The

following oversight authority functions were often mentioned among focus group participants as key service offerings that should be provided by the oversight authority in the short- and long-term:

- Short-term
    - Provide guidance and support for entities that develop & maintain quality of IEPs
    - Professional development/mentorship; evaluation
    - Work with school districts to create an uniform, qualified process
- Long-term
    - Establish interpreting standards
    - Oversee ethics and violations
    - Enforcement and regulatory authority

Some participants thought it was best for the oversight authority to enforce national standards rather than rewrite them. Many agreed that the oversight authority has a responsibility to understand the national standards and determine how they best fit Louisiana's expectations.

Regulatory Approach

Through our survey, 75% of respondents expressed the need for the implementation of a public list of Louisiana ASL interpreters who meet state minimum standards. A public list would allow consumers to be fully aware of the available professional interpreters who are acceptable for that consumer's needs, especially if the interpreter is not listed in other databases.

Furthermore, 65% of respondents felt it was necessary for an enforcement mechanism through the state, and nearly 60% wanted the state entity (oversight authority) to handle all complaints and grievances. This again points to the need for an official oversight authority for Louisiana interpreters.

5. Analysis and Recommendations

A. Primary Recommendations

Oversight Authority Structure

The following information is based on the insight, perspectives and circumstances that are unique to the state of Louisiana. Every state is at a different phase in their professionalization of ASL interpreters per the Tseng model. The guidance on proposed models and structures is influenced by, and based on the current structure that LCD exists within, the organization's history, and the dynamics of the relationship between the community and the state.

The result of the information gathered showed that some participants did not feel fully confident about LCD's ability to fully serve the needs of the interpreting community and/or of a state licensing agency; however, they found reassurance in the idea of having a separate entity fully focused on ASL interpreting standards. The oversight authority could ultimately be a group housed within LCD that consists of stakeholder experts in the

areas of the deaf community, interpreting profession, and hiring entities selected through a mechanism that ensures the appropriate and diverse representation.

This oversight authority would have the ability to make decisions and recommendations, while LCD, as an expert on the communities and languages served by this board, provides resources and support. A state licensing agency could also be a partner in this effort, providing administrative support (such as logistics and management) and resources on licensing efforts. This oversight authority would assess and understand where Louisiana is as a community, the supply and demand of the interpreting profession, and identify the next appropriate steps to support the community which include but are not limited to, partnership and collaboration, regulation, and if necessary, legislation.

Figure 10 below shows the recommended steps the oversight authority could take to incorporate recognition of a profession. It is important to note that the oversight authority must first establish a framework with the appropriate representatives. The Deaf, DeafBlind, and hard of hearing community sees the lack of interpreting standards as a crisis, but interpreters and their supporting systems (IEPs, professional associations, etc.) may not be ready for fast-paced change. By implementing a well-thought out and reasonable transitional plan, full standards and their enforcement would be possible within an appropriate time frame.

The steps in Figure 10 should be taken at a pace that is mindful and sensitive to various constituent needs and with consensus of each stakeholder of the committee and community. Any attempt to speed the process forward could lead to conflict, even if those involved agree on and share the same goal. Skipping ahead (i.e. deciding certification methods earlier than recommended) could have an adverse impact on the progress of the professionalization of ASL interpreters in the state and thus any desired legislative action to advance the Deaf, DeafBlind, and hard of hearing community's needs.

Figure 10

Recommended Steps for Louisiana ASL Interpreting Standards Board to Take

The first recommendation is that legislative and government action be taken to focus on funding for trainings and workshops for all the community groups involved, as well as to develop a stronger pipeline of quality interpreters (i.e. growth of IEPs, funding to cover interpreters' CEU fees, etc.). The incomes of interpreters in Louisiana are much lower than the current national average, therefore, it is a struggle for interpreters to afford professional development/CEUs. LCD can focus on leading the conversation on how to expand the number of IEPs across the state and potentially offer an IEP with a 4-year program. Now that LCD recently launched a state registry of qualified interpreters as of March 1, 2023, which is a critical step toward the overall goal, the agency can now turn to bringing all the stakeholders together to discuss strategies to build the supply (and listing of registered ASL interpreters), competition issues, legislative action, and other topics identified in the recommendations in this report.

Communication

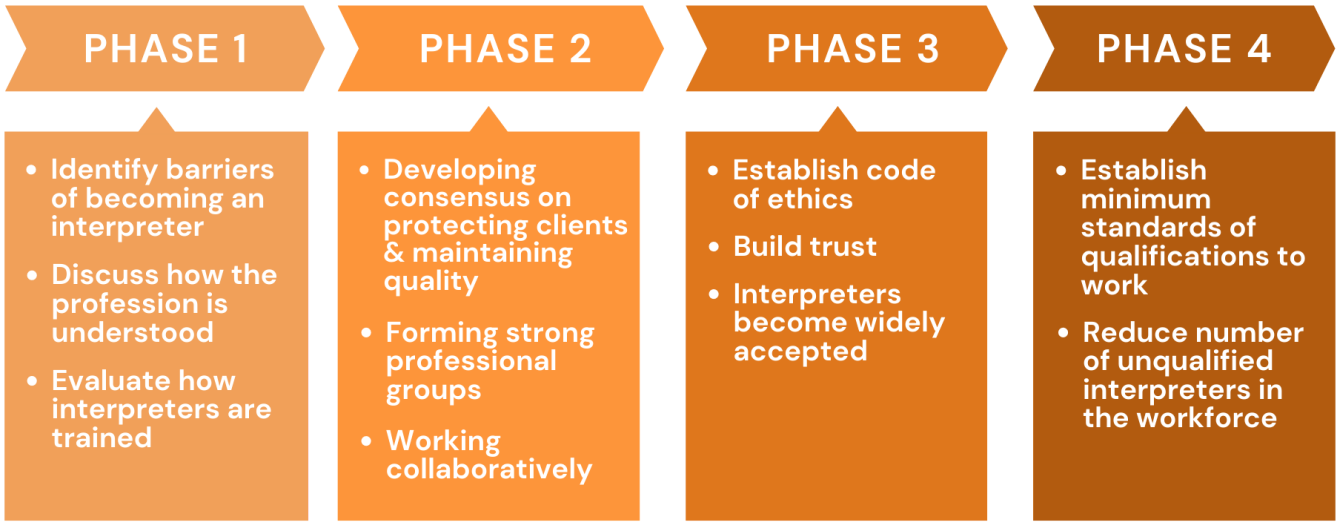
Results from the focus group and survey show that various community groups generally have consensus, and that it took transparent conversations for everyone to understand where the state currently stands and agree on what the standards could be. Almost 80% of survey participants want to stay informed by email newsletters about the process of establishing interpreting standards in Louisiana.

B. Steps Toward Professionalizing Louisiana's ASL Interpreters

The structure, analysis, and recommendations in this section utilizes Tseng's Model of Professionalization as discussed in **Framework and Approach.** Based on our company's analysis of the available information, the state of Louisiana is currently in Phase 1, Market Disorder, and is transitioning to Phase 2, Consensus & Commitment, in several areas (see Figure 11 below). Per Tseng's model, it is critical that LCD and the state of Louisiana invest sufficient resources toward achieving the requisite milestones in Phases 1 and 2 before building toward the components of Phase 3, and eventually, Phase 4.

Figure 11

A Simplified Version of Tseng's 1992 Model



Phase 1: Market Disorder

The interpreting profession in the state of Louisiana is currently in Phase 1 of Tseng's Model of Professionalization. In order to transition fully and successfully into Phase 2, the state of Louisiana, its organizations serving the community, LCD could take the lead in the following areas:

Barriers to Becoming an Interpreter

Salary

Analysis	Recommendations

More than 70% of interpreters in the state of Louisiana (both hourly freelance/contract interpreters and full-time staff interpreters with benefits) have an average annual household income of less than $50,000. Approximately 3 in 5 certified interpreters in the state of Louisiana have an average annual household income of between $25,000 to $50,000, or between $12 to $24 an hour. In comparison, a 2013 report (NCIEC) found that 35% of full-time, salaried staff interpreters individually (not by household) earn more than $50,000/year, while 65% earn less than $50,000/year. This same report stated that the mean hourly wage for freelance/contract interpreters was approximately $40 an hour. Please note that while the interpreter pay in the NCIEC report for Louisiana reflects the average pay from a decade ago; in the time since the report was published, the average salary for ASL interpreters has undoubtedly increased. Louisiana interpreters feel they are not being paid enough. Low pay could disencourage interpreters to do their best work, consider leaving the profession, and not affirm a self-perception as a professional. The pay could also disencourage prospective qualified ASL interpreters from moving into the state and maintaining and retaining the supply. According to focus group participants, new interpreters get nearly the same pay as experienced interpreters in part due to the lack of a clear definition on the level of quality and certification (Tseng Phase 1).	The state could collaborate with LAD, LRID to devise strategies permissible within anti-trust regulations to raise pay levels. This coalition of organizations could explore how other professions improved their pay in their states, how they complied with state and Federal law in such initiatives, and the subsequent outcomes. Strategies to address the rate of pay could include: ● Exploring whether the state can pay ASL interpreters providing services to state agencies at rates that fairly compensates and recognizes ASL interpreters as professionals. ● Conferring with school districts, state higher education entities, medical facilities, court systems, and other key hiring entities about paying rates that fairly compensates and recognizes ASL interpreters as professionals. ● Creating ancillary benefits to becoming an ASL interpreter or moving to Louisiana such as support for professional development or support for mentorship programs. ● Providing professional development support (in particular financial support) so ASL interpreters can earn and maintain their certifications.

Supply of ASL Interpreters

Analysis	Recommendations
Nearly half of Deaf/DB/HH survey participants were not confident they would get an interpreter for their requests when they place requests. Some consumers do not place their ASL interpreter request because they may not get an ASL interpreter. One focus group participant said a deaf consumer refused to request an interpreter for her baby's birth because she didn't want to deal with an unqualified or fraudulent interpreter. Nearly 95% of ASL interpreters said it was not difficult to find interpreting work, yet interpreting agencies have struggled to find interpreters to fill requests. Over 85% of non-certified interpreters said it was not difficult to find interpreting work in Louisiana. The data clearly shows that there are insufficient ASL interpreters whereas ASL interpreters are not having a problem finding work. The lack of state mandates and professional development requirements have had a negative impact on the progress of interpreting as a profession, which in turn exacerbates the gap between interpreter supply and quality. The lack of interpreting standards and the low supply of interpreters further deprive deaf consumers of their rights and greatly increases their risk in any situation or setting.	The state could employ the following strategies to increase the supply of professional ASL interpreters: ● Encourage more K-12 schools to provide ASL classes as a language for foreign language credit, especially in high school; ● Encourage higher education institutions to offer ASL classes; ● Collaborate with community and organizations to create a new bachelor's degree IEP program; ● Explore incentives for out-of-state interpreters to move to Louisiana, including support with education and professional development; ● Create incentives for IEP graduates to stay in Louisiana; ● Facilitate stronger coordination and collaboration among language agencies providing ASL interpreters to protect the community as well as address supply and demand issues; ● Examine strategies to address competitive practices that have an adverse impact on the supply of ASL interpreters; and, ● Explore new practices and technology that empower consumers to make decisions about their ASL interpreter experiences and keep them informed about their requests and job fulfillment.

How the Profession Is Understood

Deaf, DeafBlind, and Hard of Hearing Competency with Utilizing ASL Interpreters

Analysis	Recommendations
Nearly all Deaf, DeafBlind, and hard of hearing participants shared limited understanding and awareness about how to identify the qualities, skills and characteristics that define a professional interpreter. They also were not fully aware of how they could hold ASL interpreters accountable for their competency, professionalism, and ethical commitment. In the survey results, 55% of Deaf, DeafBlind, and hard of hearing survey participants said the current quality of the interpreter pool was good/excellent, and that 45% of Deaf, DeafBlind, and hard of hearing participants ranked current interpreting standards as moderately to very satisfactory. On the other hand, the results were significantly lower for satisfactory rates among all other community groups (ASL interpreters, hiring entities, and interpreter agencies). In the focus groups, the Deaf, DeafBlind, and hard of hearing participants were not clear on what ASL interpreters as a profession should become in the future. They also did not have a clear understanding of the profession or the systems that could govern and regulate it.	The State of Louisiana and its organizations, including LCD and entities that advocate for human rights or a similar field, could provide training to the Deaf, DeafBlind, and hard of hearing community about their rights (NCIEC n.d.). This educational series could be provided in ASL, both online and in-person, and could consist of ongoing and repeated information that is frequent enough to become a part of the community's collective knowledge. This includes: ● Hiring Deaf experts and Deaf-led organizations in the interpreting field as self-advocacy and interpreter trainers to highlight consumers' rights, expectations, and roles along with interpreters' roles, skills, and ethics. This could begin at an early age where Deaf children are taught how to work with ASL interpreters in the classroom or community and continue through high school and college where students are prepared on how to advocate for interpreting services and hold their interpreters accountable in environments such as employers, medical settings, legal settings, and more. ● Providing funding to deaf community organizations to provide training and advocacy. Local community and national organizations could also utilize the Deaf Self-Advocacy Training curriculum (NCIEC, n.d.) to train each group. ● Within certain contexts, set expectations for hiring entities' to provide support and training to those who navigate their systems on how to work with ASL interpreters while also informing consumers of their rights. For instance, the Administrative Office of the Court for Louisiana could provide Deaf, DeafBlind, and hard of hearing people with a specifically-trained advocate and resources.

How Interpreters are Trained

Interpreter Education Programs (IEP)

Analysis	Recommendations
As indicated in Figure 4, Louisiana currently has only one IEP. Delgado offers a two-year program that culminates with an associate's degree in sign language interpreting (Delgado, n.d.). The focus groups and surveys reached a consensus that having only one current IEP offering only a two-year degree, is not sufficient to build the necessary ASL interpreter pipeline that meets the community's needs.	LCD and/or the oversight authority for ASL interpreters, in collaboration with LAD and LRID and other community organizations, could: ● Serve as the lead in exploring potential IEP programs within the state's universities and colleges to support a four-year degree. ● In collaboration with the state, determine how to create incentives and partnerships to support the inception of a new IEP program. The coalition of groups should include the presence and needs of BIPOC people as a priority at every step of the process.

Phase 2: Consensus & Commitment

This effort will develop conversations and consensus on creating formal partnerships, defining what interpreting as a profession should become in the future, and determining strategies to promote ethics among the

profession. This should also include LRID conducting an organizational analysis of its organization. The surveys and focus groups shared comments that indicate LRID is perceived to be a social network group to bring together various constituent groups to share information, provide a space for cross-community integration and raise funds for professional development opportunities. The surveys and focus groups shared a desire to see LRID take a greater role in providing advocacy to address challenges within the profession and community by dedicating the space, time and resources to lead and respond to the new initiatives and the coming changes to the law and regulation of the profession.

Protecting Clients & Maintaining Quality

Quality of ASL Interpreters

Analysis	Recommendations
Louisiana does not currently have minimum standards as a requirement for most interpreting situations (Tseng Phase 4), which creates unintended but dangerous and even life-threatening consequences as outlined in this report. There are two exceptions to this, educational interpreting and court interpreting. Educational interpreting requires an EIPA level of 3 or higher, which focus group participants felt was inadequate to meet Deaf and hard of hearing children's needs for a multitude of reasons. Court interpreting requires the SC:L or similar RID certification along with a court-provided two-day course, a standard written English examination, and agreement to the Louisiana Code of Professional Responsibility for Language Interpreters. To round up the requirements to register as an ASL court interpreter, the applicant must complete a criminal background check. Aside from educational and legal interpreting, there is a lack of clarity and consensus on the need to protect consumers and definition of quality for ASL interpreting.	LCD, in collaboration with LAD and LRID, could and should advocate for the creation of an oversight authority for ASL interpreters. This oversight authority can then gauge the collective state of ASL interpreters in Louisiana on a periodic basis, and employ strategies to continue to move the community and profession forward. The oversight authority can agree on the metrics to determine the collective state of the professionalization of ASL interpreters in Louisiana. These metrics could include, but are not limited to: ● Number of K-12 ASL programs ● Number of K-12 ASL students ● Number of higher education ASL programs ● Number of higher education ASL students ● Number of IEPs ● Number of students in IEPs ● Number of certified ASL interpreters (including CDIs) and their specific certifications ● Number of uncertified ASL interpreters (including DIs) ● Number and quality of professional development programs, resources, and support for ASL interpreters ● Number of professionals within areas of specialization (e.g. educational, legal, medical, mental health, etc.). The oversight authority's work would ideally culminate in the establishment of stringent minimum requirements in Tseng Phase 4 and take a lead role in supporting and facilitating the process of phasing in the requirements over time. Once such minimum requirement standards are in place, the oversight authority can then move into deeper examination of the profession and the day-to-day management of expectations.

Complaint & Enforcement Process

Analysis	Recommendations
Survey and focus group members shared that there was no enforcement mechanism in the state, or they were not aware of one. Many indicated that they were resigned to accepting that there is no way to mitigate situations where ASL interpreters do not meet professional expectations for their competencies or compromise the profession's ethical standards.	LCD and/or the oversight authority for ASL interpreters in collaboration with LAD and LRID can explore and discuss the appropriate state agency that handles such complaints. The new oversight authority could be an entity that is considered for the management and enforcement of the complaint process. Once a system is established, this agency would be supported

	with the necessary resources and funds to provide education and training of Deaf, DeafBlind, and hard of hearing consumers on their rights, and on how to navigate the complaint and/or grievance process. This information should be fully accessible in ASL through means also accessible to the state's large DeafBlind community, and through virtual and in-person channels of communication.

Forming Strong Professional Groups

ASL Interpreter Professional Development

Analysis	Recommendations
Eighty percent of survey participants want professional development requirements in place to improve the quality of ASL interpreting services in Louisiana. There are a variety of activities that can directly contribute to the professional development of ASL interpreters including workshops, organized activities to support ASL interpreters' skill development, mentorship programs, and more. Focus group discussions and survey responses generally agreed that there were resources made available by LRID, LCD, and a handful of highlighted specific school districts that provided substantial development opportunities for their ASL interpreters; however, the availability, quality, and frequency of this professional development was insufficient to meet the needs of the community in order to transition from Tseng's Phase 1 to Phase 2.	Various organizations within the state can contribute to the overall advancement and development of ASL interpreters' professional development. These organizations are not limited to LCD, LAD, or LRID but in particular include the interpreter agencies that provide ASL interpreting services and the entities that hire ASL interpreters (hospitals, courts, employers, etc.). These organizations can employ professional development strategies that include but are not limited to: ● Experienced interpreter mentorship ● Experienced Deaf language models and mentors ● Shadowing on assignments ● Internships ● Ethics training ● Providing competency assessments ● Education ● Financial support for taking certifications and/or assessments The ASL interpreting profession requires a commitment to lifelong learning, skill development, and maintenance of knowledge. Interpreters need to continuously pursue and receive training, through expectations set by their minimum standard requirements, on ethics and professional development opportunities to improve skills.

Working Collaboratively

General Collaboration

Analysis	Recommendations
Phase 2 of Tseng's Model of Professionalization highlights the importance of collaboration and consensus; however, nearly 70% of survey participants said the level of collaboration among all groups in the interpreting community did not meet their expectations. Interpreters shared that there is a significant disconnect within the profession and among their own members, and more specifically, a longstanding rift and divide in communication, collaboration, and respect between educational interpreters and community interpreters. LRID was perceived as an organization providing informal networking opportunities, social connections, and some professional development.	Tseng said, "Powerful professions are characterized by powerful associations" (1992, p. 20). Attaining successful collaboration within the profession begins with a stronger LRID. LRID, as the association that represents ASL interpreters, must have a key and integral part in building collaboration, creating consensus, and leading the necessary changes. Tseng further explained that professional associations such as LRID hold the power to achieve the necessary goals to advance the profession and maintain the commitment of its members toward pursuing their goals. The state and community as well as LRID leaders should identify paths forward to enhance its organizational development

There was a general sentiment from the surveys and focus groups that LRID needs to take a stronger leadership role in building a collaborative relationship with the Deaf, DeafBlind, and hard of hearing community, protect the integrity of the profession, advocate for their mutual interests with the government or hiring entities, or visibly spearhead programs and initiatives the would enhance the supply and professionalism of ASL interpreters in the state (e.g. advocating for one or more colleges and Universities in the state to build a new bachelor's degree IEP program). Nearly 70% of hiring entities thought it was not easy to work with interpreting agencies. Both parties were split on this overall relationship in the survey, mostly among not having enough information and feeling that the relationship was fair. The majority of hiring entities reported either two or three contracts with interpreting agencies. However, interpreting agencies indicated that they did not work together to ensure that requests have a full interpreting team.	including: ● Volunteer leadership development ● Governance development ● Strategic prioritization ● Fund and grantmaking capacity building

Collaboration Between ASL Interpreters and Agencies

Analysis	Recommendations
ASL interpreters were split in their assessment of the relationship between interpreters and interpreting agencies. Forty percent scored poor/fair and 39% rated it as good. On the other side, 50% of interpreting agencies said they did not have enough information about the relationship to provide an assessment.	The majority of interpreting agencies felt that an oversight authority that provides direction and leadership on interpreting standard efforts could improve collaboration among interpreting agencies. Until a new oversight authority is established, LCD and/or LRID could host sessions in which ASL interpreters and ASL interpreter agencies are given the opportunity to engage in structured and intentional dialogue that focuses on understanding and appreciating various perspectives, identifying areas of consensus, and working through areas that require further conversations. The goal of these conversations would be to reach compromises or agreements on how ASL agencies and interpreters can support the profession and move forward together.

ASL Interpreter Agencies

Note: For the purpose of this report, standards for agencies that provide ASL interpreters were not discussed. The NAD is working on an accreditation program for agencies that provide ASL interpreters.

Analysis	Recommendations
Nearly 70% of hiring entity stakeholders reported they trusted interpreting agencies to ensure that the assigned interpreters were qualified for the requested jobs. Interpreting agencies are known for competing against each other and offering the lowest possible rates during their contract bids, which may result in greater utilization of unqualified/ uncertified interpreters. Furthermore, focus groups and surveys communicated that there was little to no interaction between ASL interpreter agencies.	The oversight authority could take the lead in forming healthy relationships between and among ASL interpreting agencies by cultivating collaboration through networking and other group activities. In the period of time until a new oversight authority is established, LCD and/or LRID could host sessions in which ASL interpreter agencies are given the opportunity to engage in structured dialogue focusing on understanding and appreciating various perspectives, identifying areas of consensus,agreement and

	working through areas that require further conversations. The goal of these conversations would be to reach compromises or agreements on how ASL agencies can support the profession and move forward together.

Phase 3: Professional Association

****Note: While preliminary work on these recommendations could begin prior to Tseng Phase 3, the elements of Tseng Phase 2 are critical to the success of these recommendations.*

Code of Ethics

Analysis	Recommendations***
Ethics were among the most common concerns expressed among all of the groups. It was clear that this is an area that ASL interpreters felt was most lacking within Louisiana. Concerns of ethics brought up in focus groups included the lack of boundaries between both deaf consumers and interpreters, lack of self skill awareness, such as interpreters accepting jobs they are not qualified for, and confidentiality.	All parties involved in the interpreting process require greater education and training on ethics. This could include open discussions on specific and hypothetical ethical scenarios, role-playing, and workshops on ethics and what to do in the case of unethical behavior.

Building Trust

Community & ASL Interpreter Relations

Analysis	Recommendations***
Among interpreters and the deaf community in Louisiana, 80% of the d/Deaf, DeafBlind, and hard of hearing community and 100% of ASL interpreters ranked the relationship between ASL interpreters and the community as not excellent.	LAD and LRID could improve relationships between d/Deaf, DeafBlind, and hard of hearing consumers and interpreters by generating more formal and informal opportunities for engagement between their groups. Additionally, given that IEP students are frequently expected to participate in community events as part of their training, the establishment of IEP programs could likely lead to improved relationships between these groups in due time.

Diversity of ASL Interpreters

Analysis	Recommendations***
Composition As part of LCD's Strategic Plan and the investment to grow interpreters, this focus must include expanding the training and supply of BIPOC interpreters. Out of 72 certified interpreters in the state of Louisiana, only three are Black and two are Native Americans. 100% of BIPOC interpreter participants said they did hold certifications. This may imply that BIPOC interpreters are not given the same access to opportunities and training in the state. Perception of Interpreting Pool 100% of BIPOC participants who identify as d/Deaf, DeafBlind or Hard of Hearing said the quality of the interpreter pool was not good. This may imply that BIPOC consumers do not feel represented and that there are not enough BIPOC interpreters in the state. 100% of BIPOC participants who identify as d/Deaf, DeafBlind or Hard of Hearing are only slightly confident their interpreting	The Louisiana Deaf BIPOC community is underserved when the population of ASL interpreters does not meet their cultural and linguistic needs. Furthermore, this discrepancy and inequity among ASL interpreters must be remedied to advance the principles of diversity, equity, and inclusion. This also necessitates any strategy and path forward be developed and carried out in close partnership with the New Orleans Black Deaf Advocates (NOBDA) and any collective formal or informal group of BIPOC ASL interpreters and aspiring ASL interpreters throughout the state of Louisiana outside of New Orleans. The principles of diversity, equity, and inclusion must be at the center of all discussions and decisions with regard to strategy on how to approach the BIPOC community about professionalizing interpreters and elevating the status of those currently working as ASL interpreters to professional and certified ASL interpreters. One of the common barriers to bringing new ASL interpreters who are BIPOC or who come from marginalized or underserved communities is the absence of direct outreach — in other words,

accommodation requests will be filled. Oversight Authority BIPOC participants indicated the importance of appropriate representation when making decisions that impact the deaf and interpreting communities, which includes ensuring a wide range of representation among racial diversity in the Interpreting Standards Board. 100% of BIPOC participants felt it was: ● "Very important" that the oversight authority group be independent and work to reduce bias in its decision-making process on matters that affect the state's interpreting profession. ● "Very important" that the oversight authority group include Deaf, Hard of Hearing, and/or DeafBlind decision-makers who are familiar with the needs of the deaf community. ● "Important" that the oversight authority group includes decision-makers with expertise in licensure and regulations. ● "Very important" that the oversight authority group include decision-makers with expertise in ASL interpreting. ● "Very important" that the oversight authority group include decision-makers with expertise in K-12 educational interpreting. Nearly 60% of BIPOC participants responded they want the Louisiana Commission for the Deaf to be the oversight authority of interpreting standards. The reasons were not explicitly clear; however, given the available information may have to do with the lack of equitable representation and support in such oversight of the profession.	asking them to consider ASL interpreting as a career. Steps could include recruiting from among BIPOC children of Deaf adults (CODA) or reaching out to communities with large BIPOC populations that have ASL classes or programs. The state and profession can further incentivize BIPOC interpreters by offering scholarship programs to pursue professional development or formal education through IEP programs, including potentially at HBCUs. Furthermore, the Louisiana community could consider forming an IEP program at a HBCU from those within the state. The ultimate goal for the overall effort would be to achieve a racial composition of ASL interpreters that is reflective of the demographics and population of Louisiana as a whole.

Acceptance of Interpreters

Increasing Familiarity with the Interpreting Process

Analysis	Recommendations***
Just over 62% of hiring entities shared that they were not at all familiar or were only slightly familiar with the principles and standards that would ensure that interpreters w meet consumers' expectations. In other words, a hiring entity such as a doctor's office may not be familiar with the purpose, role, responsibility, expected competency, and/or ethical obligations of an ASL interpreter. This can become challenging on numerous levels.	LCD could provide a campaign to educate hiring entities on the purpose and role of an ASL interpreter, as well as how to work with Deaf, DeafBlind, and hard of hearing consumers and ASL interpreters to ensure a successful partnership and provision of services. This could include outreach and education at the hiring entities including medical offices and facilities, courts, employers, K-12 education, higher education, human services, and other common settings where ASL interpreters are frequently employed.

Phase 4: Political Persuasion

*****Note: While preliminary work on these recommendations could begin prior to Tseng Phase 4, the elements of Tseng Phase 2, and eventually Phase 3, are critical to the success of these recommendations.*

Minimum Standards of Qualifications to Work

ASL Interpreter Standards

Analysis	Recommendations****
Fifty percent of survey participants said current interpreting standards in Louisiana were not at all satisfactory and slightly satisfactory. Nearly all, if not all, focus group participants said interpreting standards were unsatisfactory, and that interpreters were seen as “helpers" rather than professionals.	Statewide standards could be established by an oversight authority through the promulgation of regulations that specify certification and/or assessment requirements. The specification of certifications and/or assessments including specialized certification and/or assessments are not recommended to be codified into law or through legislation for several reasons, which include but are not limited to: ● frequent changes in the ASL interpreting landscape and the need for the oversight authority to adapt to these changes ● limited knowledge of legislators about the ASL interpreting profession and the Deaf community ● onerous process of changing legislation when necessary This phase and task can be addressed once Tseng’s Phases 1-3 have been met to the community and profession’s satisfaction and all constituents affected are prepared to move forward to Phase 4. Following the Tseng sequence of phases would facilitate collaboration and consensus among the key constituent groups and bring the ASL interpreting field a level of bona fide professionalization. In the effort to establish an oversight authority the source of funding needs to be identified within Louisiana’s state system and/or revenue mechanism(s) through program fees. Operating a certification or assessment oversight program must have a commitment from the state for sustained, stable funding.

Specializations

Analysis	Recommendations****
Over 60% of survey participants thought the following fields of specialization should be considered when establishing stand-alone minimum interpreting standards in Louisiana: 1. legal/courts 2. mental health 3. medical 4. education. Almost half of survey participants thought religious services and deaf interpreters (due to a lack of Certified Deaf Interpreters, or CDIs)) should have special waivers when considering interpreting standards. Nearly 60% of survey participants said there was a moderate/high level of demand for professional CDIs.	Statewide standards for specialized fields could be established by an oversight authority through the promulgation of regulations that specify certification and/or assessment requirements. The specification of certifications and/or assessments including specialized certification and/or assessments are not recommended to be codified into law or through legislation for several reasons, which include but are not limited to: ● frequent changes in the ASL interpreting landscape and the need for the oversight authority to adapt to these changes ● limited knowledge of legislators about the ASL interpreting profession and the Deaf community ● onerous process of changing legislation when necessary This phase and task can be addressed once Tseng’s Phases 1-3

Additionally, focus group participants felt that the Louisiana Department of Education has not provided adequate support for educational interpreters, which in turn have an adverse impact on the education of Deaf and hard of hearing students.	have been met to the community and profession's satisfaction and all constituents affected are prepared to move forward to Phase 4. Following the Tseng sequence of phases would facilitate collaboration and consensus among the key constituent groups and bring the ASL interpreting field a level of bona fide professionalization. LCD and/or the oversight authority would need to lead conversations with the Louisiana Department of Education and Louisiana Supreme Court Office of Language Access about educational interpreters and legal interpreters respectively. This would include collaboration with LRID and LAD to determine the expectations for these entities to provide oversight and resources to support specialized interpreters. Once these expectations are identified, then the conversations can then focus on the most appropriate entity that provides oversight for each of the specialized interpreters (the new oversight authority, Louisiana Department of Education,Office of Language Access, or another entity).

Reducing the Number of Unqualified Interpreters in the Workforce

Current Legislation and Regulations

Analysis	Recommendations****
Seventy percent of survey participants and most of the focus group participants want certification requirements in place to improve the quality of ASL interpreting services in Louisiana.	Statewide standards could be established by an oversight authority through the promulgation of regulations that specify certification and/or assessment requirements. This phase and task can be addressed once Tseng's Phases 1-3 have been met to the community and profession's satisfaction and all constituents affected are prepared to move forward to Phase 4. Following the Tseng sequence of phases would facilitate collaboration and consensus among the key constituent groups and bring the ASL interpreting field a level of bona fide professionalization.

6. Conclusion

Innivee Strategies commends BFH and LCD leadership for engaging our company in its effort to bring a Deaf-led, Deaf-centric lens to this project and for their shared dedication to advancing ASL interpreting standards in the state of Louisiana. We greatly appreciate all those who were involved for their time, participation, ideas, and insight.

As evidenced by the extent of this report, the establishment of interpreting standards is no small feat. It is critical that LCD and BFH continue to engage d/Deaf, DeafBlind, and hard of hearing individuals and other key constituents as these standards are developed. Furthermore, we wish to emphasize the importance of laying the foundation for successful development and implementation of standards, as illustrated by Joseph Tseng's model of professionalization.

We believe that Louisiana has an opportunity to become a model for other states and create a model of interpreting that is truly equitable and inclusive of d/Deaf, DeafBlind, and hard of hearing people and their varied needs. We remain optimistic and enthusiastic about the future of LCD, Louisiana, and the Louisiana d/Deaf, DeafBlind, and hard of hearing community and their eventual success.

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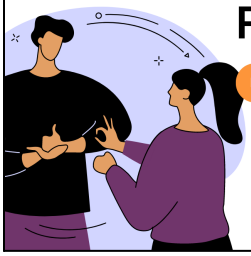
APPENDIX A: EDUCATIONAL SLIDES

LCD Interpreter Needs Assessment Project



Educational Slides for Review

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LCD Goal

Establish new systems and standards for American Sign Language (ASL) interpreting which define, describe, and incentivize new expectations for and oversight of the quality of ASL interpreters, including those in educational settings.

Our Goal

Propose a sign language interpreter framework to establish oversight and regulatory policies and procedures, based on community input, statewide data, and best practices.

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Agenda

What should the Louisiana ASL interpreting standards be?

1. The Process
2. Current Market
3. Oversight Authority
4. Regulatory Approach
5. Specialization

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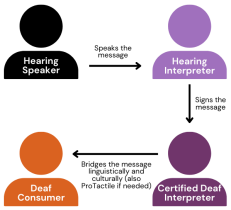
Important Note

For the purpose of this project, we are focused on the role of ASL interpreters ONLY. For situations that may include Certified Deaf Interpreters, we will only focus on their interpreting profession. This does not include Support Service Providers (SSP).

What is a Certified Deaf Interpreter (CDI)?

A CDI is a specialist who provides interpreting, translation, and transliteration services in ASL and other visual and tactual communication forms used by individuals who are Deaf, hard of hearing, and DeafBlind.

As a Deaf person, the CDI starts with a distinct set of formative linguistic, cultural, and life experiences that enables nuanced comprehension and interaction in a wide range of visual language and communication forms influenced by region, culture, age, literacy, education, class, and physical, cognitive, and mental health. These experiences coupled with professional training give the CDI the ability to successfully communicate across all types of interpreted interactions, both routine and high risk.



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The Process

1. ANALYZE CURRENT MARKET
The current market and constituent expectations of the interpreting profession in Louisiana is analyzed and evaluated to best determine the needs assessment framework

2. DETERMINE OVERSIGHT AUTHORITY
Louisiana deaf/interpreting community to assess options for the agency (LCD, licensing agency, etc.) that makes decisions and establishes minimum interpreter standards

3. ESTABLISH APPROACH
Constituents to evaluate expectations on how interpreter quality should be enforced and managed (public list, enforcement, professional development)

4. CREATE REGULATIONS
The chosen oversight authority (after legislative efforts) will make decisions on issues such as the certification to recognize (RID, BEI, QAS, etc.) and other regulatory details

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The more control practitioners of an occupation are able to exert over the substance of their work and the market in which they operate, the more professionalized the occupation.

Joseph Tseng

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Tseng's Model of Professionalization

The process of making ASL interpreters a widely recognized professional occupation may include:

PHASE 1	PHASE 2	PHASE 3	PHASE 4
• Identify barriers of becoming an interpreter • Discuss how the profession is understood • Evaluate how interpreters are trained	• Develop consensus to protect clients & maintain quality • Form strong professional groups • Work collaboratively	• Establish code of ethics • Build trust • Interpreters are widely accepted	• Establish minimum standards of qualifications to work • Reduce number of unqualified interpreters in the workforce

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1 Current Assessment

What you need to think about as you prepare to participate in the focus group and/or survey:

Also think about **how** we can bring these mechanisms **TOGETHER**:

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2 Oversight

Who should make decisions on interpreting standards and certifications?

Commission/Office for D/HH | **Licensure Agency** | **Other?**

This group will be make detailed decisions on minimum requirements and certifications such as:

- Licensing or registration (i.e. standards to enforce, like RID certification, BEI, QAS, etc.)
- Minimum credentials for high risk or specialty settings (i.e. educational interpreting minimum score)
- Enforcement procedures for handling complaints and violations (i.e. what should happen if an unqualified interpreter shows up at your appointment?)
- Reciprocity with other states (i.e. what are the rules when interpreters from Texas or Mississippi come to interpret in Louisiana?)
- Professional ethical standards
- Confidentiality requirements

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2 Oversight

Who should make decisions on interpreting standards and certifications?

Commission/Office for D/HH

Operated & managed by Louisiana Commission for the Deaf

Licensure Agency

Operated and managed by a state agency or other authorizing office/board

Example: Louisiana State Licensing Board for Contractors

Other?

Independent body outside the state government (i.e. Louisiana Registry of Interpreters for the Deaf)

Other ideas?

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2 Oversight

Commission/Office on D/HH

BENEFITS
- Linguistic and cultural competence
- Relationship with the community
- Relationship with professionals
- Ability to make adjustments on the go

RISKS
- Limited capacity, funding & resources
- Lack of experience with licensure/regulations

Licensure Agency

BENEFITS
- Greater capacity, funding & resources
- Expertise with management of licensure/regs

RISKS
- Little to no linguistic and cultural competence
- Lack of engagement with consumers
- Lack of engagement with professionals

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3 Regulatory Approach

Public List

Making a list of qualified interpreters publicly available makes it possible for consumers and hiring entities to determine and choose interpreters that meet minimum standards and their neeeds

Enforcement

Grievance through state agency (state process for receiving and handling complaints)

Private right of action (Consumers can take legal action directly against interpreters that do not meet established standards)

Professional Development

Requirements interpreters have to meet at a timely basis (i.e. earn CEU credits over a period of time and renewal)

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3 Regulatory Approach

Public List

BENEFITS
- Public (Deaf & hard of hearing community, hiring entities can see who meets minimum standards); empowers Deaf consumers and hiring agencies to identify qualified interpreters

RISKS
- Oversight authority needs to ensure this list is up to date frequently to avoid malpractice

Enforcement

BENEFITS
- Action taken by consumers
- Hold professionals accountable
- Establish a ladder of fines/ offenses for repeat violations

RISKS
- Puts burden on the consumer to navigate legal action(s)
- Potential consumer retaliation
- Puts a burden on the consumer to be exposed to potential damage before being able to stop an unqualified interpreter

Professional Development

BENEFITS
- Interpreters knowledge and skills are updated with current issues and information

RISKS
- Insufficient CEUs may be offered within the state
- Financial affordability of CEUs

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4 Specializations

These high-risk or specialized settings can be determined to establish a higher level of minimum credentials, which may include additional specialized training and higher skill sets.

Several areas of focus are mentioned:

Medical | **Mental Health** | **Legal/Courts** | **Education**

Are there other settings that should be considered?

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Thank you!

Click here to take the survey!

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APPENDIX B: COMMON THEMES

An overview of common themes from all focus groups and survey results. Green highlights show consistent consensus among audience groups, while yellow highlights point out possible contradictory views.

Current Market

<table>
<tr><th>CURRENT MARKET</th><th>Collaboration: Deaf Community & Interpreting Agencies</th><th>Collaboration: Interpreters & Interpreting Agencies</th><th>Collaboration: Interpreters & Hiring Entities</th><th>Collaboration: Interpreting Agencies & Hiring Entities</th><th>Collaboration: Interpreting Agencies & Government Officials</th><th>Greatest Challenge to Advancing Interpreting Standards</th><th>Second Greatest Challenge to Advancing Interpreting Standards</th></tr>
<tr><td>Deaf Consumers</td><td>Lacking; agencies don't care about deaf consumers' experiences and pocket funds from the state</td><td>N/A</td><td>N/A</td><td>N/A</td><td>N/A</td><td rowspan="4">Insufficient interpreting training & mentorship</td><td rowspan="4">Supply and retention of interpreters; enforcement of interpreting quality; insufficient salary for interpreters</td></tr>
<tr><td>Interpreters</td><td>N/A</td><td rowspan="2">Agencies compete against each other, focusing only on their companies rather than supporting interpreters and the community; compete to offer cheaper rates</td><td>N/A</td><td>N/A</td><td>N/A</td></tr>
<tr><td>Interpreting Agencies</td><td>Not strong; needs improvement to build relationships to gather feedback and insight</td><td>Needs improvement</td><td>Lacking</td><td>Nonexistent; could improve if agencies work together to represent the interpreting community in government</td></tr>
<tr><td>Hiring Entities</td><td>N/A</td><td>N/A</td><td>Lacking; can't rely on LRID due to unstable leadership</td><td>Lacking; Hiring entities would encourage interpreters to work for agencies so they can be more available across the state and to build experience, be paired with mentors, etc., but agencies would steal interpreters to work for them full time instead of working for entities full time. Hiring entities would still contract with agencies because they don't really have a choice.</td><td>N/A</td></tr>
<tr><td>Survey</td><td>50% of the D/HH/DB community ranked this relationship as good/excellent, while interpreting agencies were split 50/50 between not having enough information and good/excellent.</td><td>50% of interpreting agencies said they do not have enough information about this relationship, while ASL interpreters were split among poor/fair (40%) and good (39%).</td><td>N/A</td><td>Nearly 70% of hiring entities thought it was not easy working with interpreting agencies. Both parties were split on this overall relationship in the survey, mostly among not having enough information and that the relationship was fair. The majority of hiring entities have either two or three contracts with interpreting agencies.</td><td>N/A</td><td>The majority of survey participants (40%) said insufficient interpreting training/mentorship was the greatest challenge to advancing interpreting standards in Louisiana.</td><td>The majority of survey participants (27%) said the second greatest challenge was supply and retention of interpreters.</td></tr>
</table>

CURRENT MARKET	Current State of Professionalization	Interpreting Standards	Supply of Interpreters	Interpreter Training Programs (ITPs)	Educational Interpreters	Ethics & Professionalization	Collaboration: Interpreting Community	Collaboration: Interpreters & Deaf Community
Deaf Consumers	Phase 1	Lacking	Very scarce; even more so for qualified interpreters who understands the need of the community; very political and competitive	Some teachers are good but the students do not have motivation to improve skills outside of class; lacking quality ITPs so students are taking advantage of the system to get an easy way in to a "profession"	Many educational interpreters are not qualified and do not hold an appropriate EIPA score; each school district hire differently without consistency across the state; no oversight regardless of the fact it is under the Department of Education; needs better standardization for deaf children's language models	Around 30% of the pool are professional; the rest are unqualified and unethical; many interpreters struggle with ASL to English transition	N/A	None -- interpreters do not understand the needs of the deaf community, they only work to earn a living
Interpreters		Lacking; seen as "helpers, assistants"; unqualified interpreters are sent to interpret in inappropriate settings (education, health, etc.)		Not enough programs; the current one is not qualified enough to build a pipeline; also need a focus on mentorship and specialized setting training		N/A	Big disconnect among interpreters; divide between educational interpreters and community interpreters	Lacking; boundaries set, agencies have contracts that do not allow interpreters to chat/connect with deaf consumers
Interpreting Agencies		Lacking; very behind compared to other states				Very bad ethics and professionalization among interpreters currently, regardless of certification status	Needs improvement	Needs improvement
Hiring Entities		The lack of state mandates and professional development requirements have negatively impacted the progress of viewing interpreting as a profession, which has thus impacted the gap of maintaining interpreter supply and quality				N/A	N/A	N/A
Survey	55% of D/HH/DB participants said the current quality of the interpreter pool was good/excellent.	50% of survey participants said current interpreting standards in Louisiana were not at all/slightly satisfactory.	45% of deaf consumers are not confident they will get an interpreter at their appointment when placing a request.	N/A	N/A	Over 60% of hiring entities are not familiar with the principles and standards that ensures interpreters possess the appropriate qualifications for deaf consumers.	Nearly 70% of survey participants said collaboration among all groups in the interpreting community was not at a high level.	80% of the D/HH/DB community ranked this relationship as not excellent, while all of the ASL interpreters agreed (100%) it was not excellent.

Oversight Authority

OVERSIGHT AUTHORITY	Oversight Authority	Who Oversight Board Should Include	Oversight Board Functions	Educational Interpreters
Deaf Consumers	LCD with an "independent" authority partner or oversight that handles administrative work. LRID was often emphasized as NOT suitable	Mix of variety stakeholder experts; D/HH/DB who are familiar with the deaf community, educational system, etc.; also have representation from each speciality certificate, including ITP coordinators, new interpreters, interpreting agencies, etc.	The oversight board needs to be a hub to bring everyone and everything together; establish interpreting standards, promote legislative recognition of ASL as a language; professional development/CEUs, ITPs, evaluation, enforcement, etc.	Should not be under Department of Education
Interpreters			Develop & mainain quality of ITPs; oversee ethics and violations; offer mentorship/support/evaluations; work with school districts to create an uniform, qualified process; enforcement and regulatory authority	Include with oversight authority; should NOT be under Department of Education
Interpreting Agencies			ONE group to handle major functions (licensure, CEUs, training, research, grievance); no divide or stratification of responsibility	Unsure
Hiring Entities			Professional development/evaluation; establishing interpreting standards (not rewriting, but enforcing national standards -- the oversight board has a responsibility to understand the national standards and determine the best fit for Louisiana.)	The department of education does not have any knowledge or involvement in the deaf education program, so they should not be involved in oversight of educational interpreters
Survey	Around 42% of survey participants wanted LCD to be the oversight authority, with a licensing agency within the state government trailing behind at 25%. Over 80% of survey participants thought it was moderately/very important that the oversight authority group be independent and work to reduce bias in its decision-making process.	When discussing who the oversight board should include, 85% thought it was moderately/very important to include decision makers with expertise in ASL interpreting, as well as deaf/hh/db decision makers (80%), K-12 educational interpreting experts (76%), and experts in licensure and regulations (75%).	The majority of interpreting agencies felt that an oversight authority that provides direction and leadership on interpreting standard efforts could improve collaboration among interpreting agencies.	76% of survey participants thought the oversight authority group should include decision makers with expertise in K-12 educational interpreting.

Regulatory Approach

REGULATORY APPROACH	PROS: Public List of Interpreters that Meet State Minimum Standards	CONS: Public List of Interpreters that Meet State Minimum Standards	PROS: Enforcement Mechanism	CONS: Enforcement Mechanism	PROS: Professional Development Requirements	CONS: Professional Development Requirements
Deaf Consumers	Provides deaf consumers with autonomy and protection; could include rating system; weeds out unqualified interpreters; motivates interpreters to get certified	Agencies will steal interpreters from each other	Empowers deaf consumers to weed out unqualified interpreters; provide better understanding of what ethics and professionalization should look like; encourage interpreters to only accept jobs they are skilled to do	N/A	CEUs will help fill the gap of the current lack of training/mentorship; may provide incentive for interpreters to improve their knowledge and skills; pay could be increased for interpreters with CEUs	Costly and time consuming for interpreters; not enough professional development opportunities
Interpreters	Already the RID approach; weeds out unqualified interpreters; should include educational interpreters on this list	Lack of supply already, meaning when they are weeded out, deaf consumers and students may be left without interpreters at all	Helps enforce quality and ethics; empowers deaf consumers and stakeholders to maintain control of the quality; RID/BEI already have their own grievance process to use. Develop a process for educational interpreters	Will be a long process		
Interpreting Agencies	Above + provides convenience for hiring entities or anyone who does not have an understanding of the profession; raises the bar, should help with increasing pay, which will help with higher quality of service		Much needed; will help people understand what is defined as a professional interpreter; may provide incentive for interpreters to improve their skills	N/A		
Hiring Entities	Already the RID approach; weeds out unqualified interpreters; should include educational interpreters on this list	May not provide incentives for interpreters to grow in their profession	Provides consistency throughout the state, following the same guidelines, rules, expectations	How are interpreters protected, do they have to carry insurance? Already face a lack of supply, this could scare them off		
Survey	75% of survey participants felt strongly about implementing a public list of interpreters that meet state minimum standards.	N/A	Around 65% of survey participants felt strongly about having an enforcement mechanism of grievances through the state, while nearly 60% want the oversight authority to handle complaints/grievances.	50% of survey participants disagreed with the private right of action approach of enforcement.	80% of survey participants want professional development requirements in place to improve the quality of ASL interpreting services in Louisiana.	Over 80% of interpreters said there were not enough professional development and training opportunities in Louisiana.

APPENDIX C: DATA RESULTS

Louisiana State ASL Interpreter Standards Survey Data Results
Total sample size = 60

Data is highlighted green to show the respective question's highest response option. Yellow is highlighted to show the second highest response option, if trailing behind the highest data number. Purple highlights signify bivariate analyses.

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COMMUNITY GROUP 1: INTERPRETERS

How many years of interpreting experience do you have?

	Percent
0 - 3 years	0%
4 - 7 years	22.22%
8 - 10 years	11.11%
10+ years	66.67%

What certifications do you hold? Select all that apply.

	Percent
Registry of Interpreters for the Deaf (RID) certification	38.89%
Texas Board for Evaluation of Interpreters (BEI) certification	5.56%
Other	22.22%

I do not hold any certification(s)	50%

BIVARIATE ANALYSIS:
Interpreters with 8+ years of interpreting experience hold the following certifications:

	Percent
Registry of Interpreters for the Deaf (RID) certification	42.85%
Texas Board for Evaluation of Interpreters (BEI) certification	7.14%
Other	21.42%
I do not hold any certification(s)	42.85%

In what capacity is ASL interpreting your occupation?

	Percent
I work as an interpreter on a need-be basis	11.11%
I work as an interpreter part-time	5.56%
I work as an interpreter full-time	72.22%
Other	11.11%

BIVARIATE ANALYSIS:
Interpreters who work full time hold the following certifications:

	Percent
Registry of Interpreters for the Deaf (RID) certification	30.77%
Texas Board for Evaluation of Interpreters (BEI) certification	7.69%
Other	23.08%
I do not hold any certification(s)	53.85%

What is your average annual salary as an ASL interpreter?

	Percent
Less than $25,000	16.67%
$25,000-$50,000	55.56%

$50,000-$75,000	11.11%
$75,000-100,000	11.11%
$100,000-$200,000	0%
More than $200,000	0%
Prefer not to answer	5.56%

BIVARIATE ANALYSIS:

What is the average annual salary of certified interpreters in Louisiana?

	Percent
Less than $25,000	0%
$25,000-$50,000	62.50%
$50,000-$75,000	12.50%
$75,000-100,000	25%
$100,000-$200,000	0%
More than $200,000	0%
Prefer not to answer	0%

Where do you provide services? Select all that apply.

	Percent
Healthcare/medical	55.56%
Mental health	27.78%
Human/social services	44.44%
Employment/job-related	61.11%
K-12 education	50%
Post-secondary education	38.89%
Legal	22.22%
Video Relay Interpreting (VRS)	22.22%

Video Remote Interpreting (VRI)	44.44%
Family/personal matters	50%
General consumer	33.33%
Performing arts	11.11%
Religious activities	27.78%
Other settings	16.67%

BIVARIATE ANALYSIS:
Interpreters who do NOT hold certifications work in the following settings:

	Percent
Healthcare/medical	33.33%
Mental health	0%
Human/social services	22.22%
Employment/job-related	44.44%
K-12 education	66.67%
Post-secondary education	22.22%
Legal	0%
Video Relay Interpreting (VRS)	11.11%
Video Remote Interpreting (VRI)	22.22%
Family/personal matters	33.33%
General consumer	22.22%
Performing arts	0%
Religious activities	44.44%
Other settings	11.11%

How easy is it for you to find interpreting work in your state?

	Percent

Easy	38.89%
Moderate	55.56%
Difficult	5.56%
Very Difficult	0%

BIVARIATE ANALYSIS:

How easy is it for non-certified interpreters to find interpreting work in Louisiana?

	Percent
Easy	33.33%
Moderate	55.56%
Difficult	11.11%
Very Difficult	0%

How confident are you in your local professional association (i.e. your state chapter's Registry of Interpreters for the Deaf) to represent and advocate on behalf of interpreters?

	Percent
Not at all confident	22.22%
Slightly confident	22.22%
Moderately confident	22.22%
Very confident	22.22%
I do not have enough information to respond	11.11%

In terms of the level of professional development and training opportunities for ASL interpreters within your state, there are:

	Percent
Not enough opportunities	33.33%
Some opportunities	50%
Several opportunities	0%
Many opportunities	16.67%

I do not have enough information to respond	0%

What should be provided in your state in terms of education and training for interpreters? Select all that apply.

	Percent
Interpreter training programs	83.33%
State professional development opportunities	88.89%
Mentorship programs	88.89%
Other	11.11%

Where did you receive your training for ASL interpreting? Select all that apply.

	Percent
ASL-fluent family member/CODA	27.78%
Did not receive official ASL interpreting training/Learned on my own	5.56%
College-level interpreter training program in my state	61.11%
College-level interpreter training program out of state	27.78%
High school ASL classes	0%
Online/community ASL classes	16.67%
Private one-on-one training	11.11%
Other	11.11%

Generally, what is the relationship like between ASL interpreters and interpreting agencies in your state?

	Percent
Poor	11.11%
Fair	27.78%
Good	38.89%
Excellent	0%

I do not have enough information to respond	22.22%

Generally, what is the relationship like between ASL interpreters and hiring entities in your state?

	Percent
Poor	22.22%
Fair	33.33%
Good	16.67%
Excellent	0%
I do not have enough information to respond	27.78%

Generally, what is the relationship like between the deaf community and ASL interpreters in your state?

	Percent
Poor	16.67%
Fair	27.78%
Good	38.89%
Excellent	0%
I do not have enough information to respond	16.67%

How involved are you in deaf and interpreting-related community groups, organizations, and events?

	Percent
Not involved	11.11%
Somewhat involved	61.11%
Mostly involved	27.78%
Actively involved	0%

COMMUNITY GROUP 2: DEAF, HARD OF HEARING, AND DEAFBLIND

Based on your experience and observations of the skills among ASL interpreters in your state, how would you rate the quality of the interpreter pool?

	Percent
Poor	10%
Fair	35%
Good	40%
Excellent	15%
I do not have enough information to respond	0%

When making a request for interpreting accommodations, how confident are you that you will get your request filled?

	Percent
Not at all confident	5%
Slightly confident	40%
Moderately confident	25%
Very confident	30%
I do not use interpreters as an accommodation	0%

When you make a request for interpreting accommodations, how confident are you that your request will be filled with an interpreter that will satisfy your needs and/or meet your expectations for quality?

	Percent
Not at all confident	0%
Slightly confident	40%
Moderately confident	40%
Very confident	20%
I do not use interpreters as an accommodation	0%

Generally, what is the relationship like between the deaf community and ASL interpreters in your state?

	Percent
Poor	5%
Fair	20%
Good	50%
Excellent	20%
I do not have enough information to respond	5%

Generally, what is the relationship like between the deaf community and interpreting agencies in your state?

	Percent
Poor	15%
Fair	30%
Good	35%
Excellent	15%
I do not have enough information to respond	5%

COMMUNITY GROUP 3: INTERPRETING AGENCIES

How easy is it for you to find interpreters to fill requests?

	Percent
Easy	0%
Moderate	66.67%
Difficult	33.33%
Very Difficult	0%

Generally, what is the relationship like between the deaf community and interpreting agencies in your state?

	Percent
Poor	0%
Fair	0%
Good	33.33%
Excellent	16.67%
I do not have enough information to respond	50%

Generally, what is the relationship like between ASL interpreters and interpreting agencies in your state?

	Percent
Poor	0%
Fair	0%
Good	33.33%
Excellent	16.67%
I do not have enough information to respond	50%

Generally, what is the relationship like between interpreting agencies and hiring entities in your state?

	Percent

Poor	0%
Fair	33.33%
Good	16.67%
Excellent	16.67%
I do not have enough information to respond	33.33%

Generally, what is the relationship like between ASL interpreters and hiring entities in your state?

	Percent
Poor	0%
Fair	33.33%
Good	33.33%
Excellent	16.67%
I do not have enough information to respond	16.67%

Would an oversight authority that provides direction and leadership on interpreting standard efforts improve your agency's collaboration among other agencies?

	Percent
No	0%
Maybe	66.67%
Yes	33.33%

What should be provided in your state in terms of education and training for interpreters? Select all that apply.

	Percent
Interpreter training programs	0%
State professional development opportunities	66.67%
Mentorship programs	33.33%
Other	0%

COMMUNITY GROUP 4: HIRING ENTITIES

How many different interpreting agencies do you have a contract with?

	Percent
None	12.50%
One	18.75%
Two	31.25%
Three	25%
Four	0%
Five or more	6.25%
I don't know	6.25%

Do you trust interpreting agencies to ensure that the interpreters they send are qualified for the requested job?

	Percent
Yes	68.75%
No	12.50%
I do not manage interpreting requests	18.75%

How familiar are you with the principles and standards that would ensure that interpreters who are assigned to your clients meet the client's expectations?

	Percent
Not at all familiar	18.75%
Slightly familiar	43.75%
Moderately familiar	12.50%
Very familiar	12.50%
I do not have enough information to respond	12.50%

How easy is it for you to work with agencies to get interpreters for your requests?

	Percent

Easy	18.75%
Moderate	43.75%
Difficult	25%
Very Difficult	0%
I do not work with agencies	12.50%

What is your process like when deaf consumers tell you the interpreter that was hired is not qualified and/or did not meet the consumer's expectations?

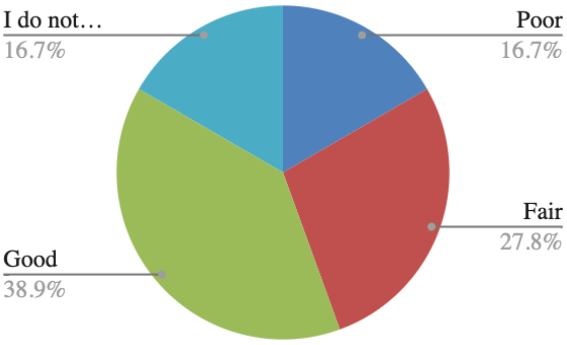
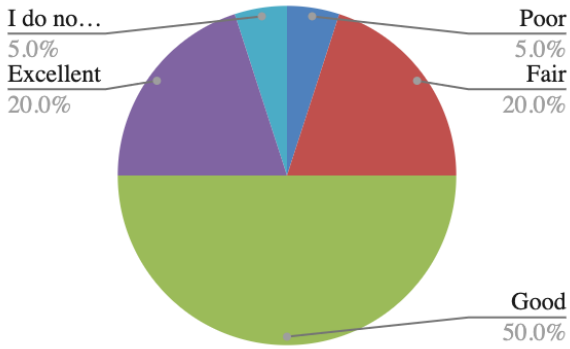
	Percent
We don't have a process in place	25%
We contact the interpreting agency to let them know	37.50%
We contact the interpreting agency and tell them to not assign that specific interpreter again	31.25%
Other	0%
I don't know	6.25%

Generally, what is the relationship like between interpreting agencies and hiring entities such as your company/organization in your state?

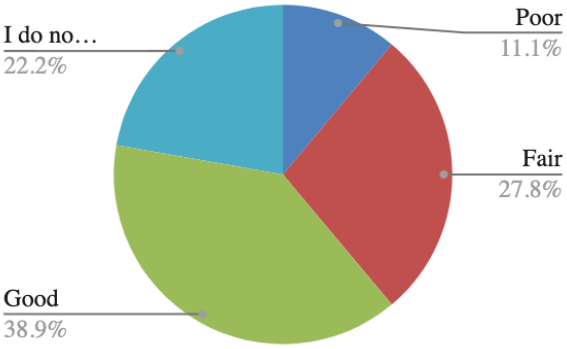
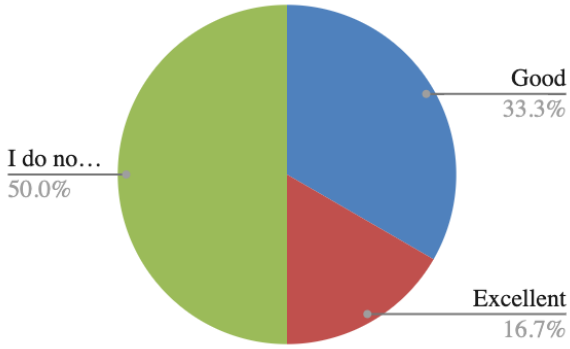
	Percent
Poor	0%
Fair	25%
Good	50%
Excellent	0%
I do not have enough information to respond	25%

RELATIONSHIP COMPARISONS

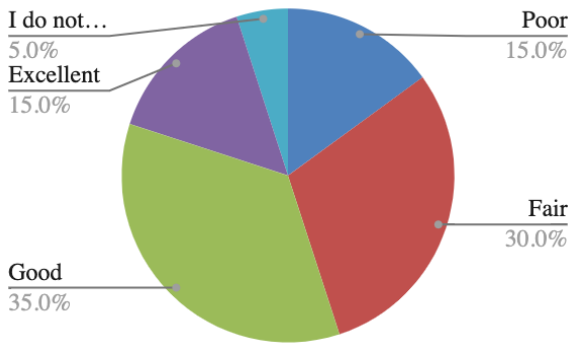
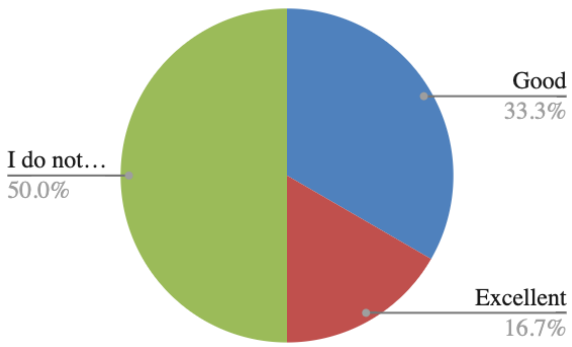
Generally, what is the relationship like between the deaf community and ASL interpreters in your state?

ASL Interpreters	d/Deaf/DeafBlind/Hard of Hearing Community
	

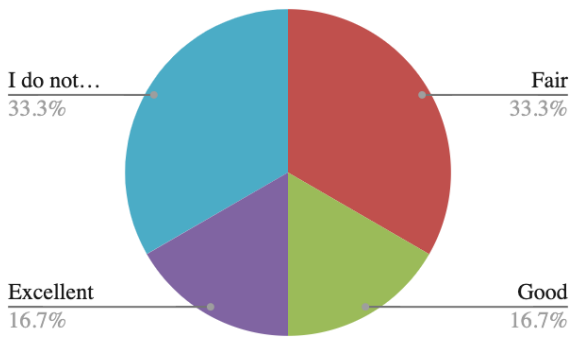
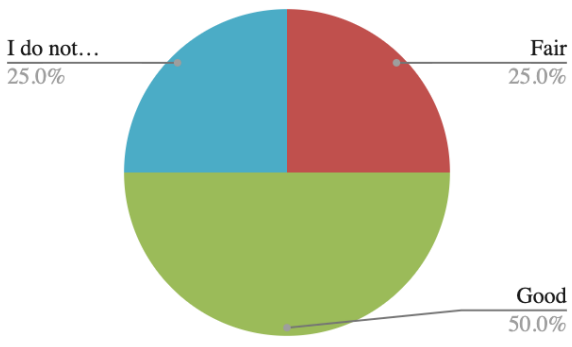
Generally, what is the relationship like between ASL interpreters and interpreting agencies in your state?

ASL Interpreters	Interpreting Agencies
	

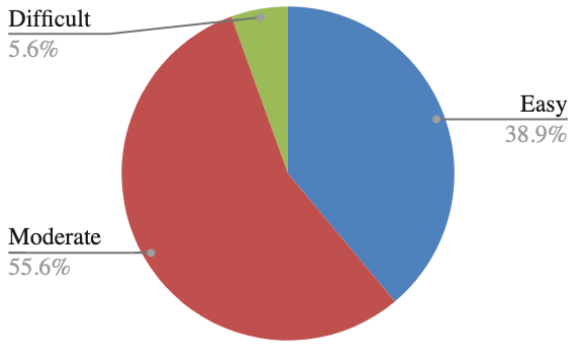
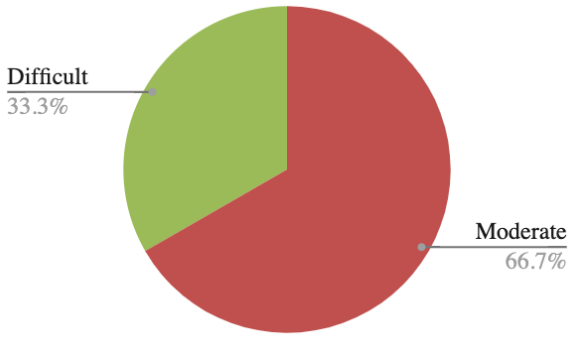
Generally, what is the relationship like between the deaf community and interpreting agencies in your state?

d/Deaf/DeafBlind/Hard of Hearing Community	Interpreting Agencies
	

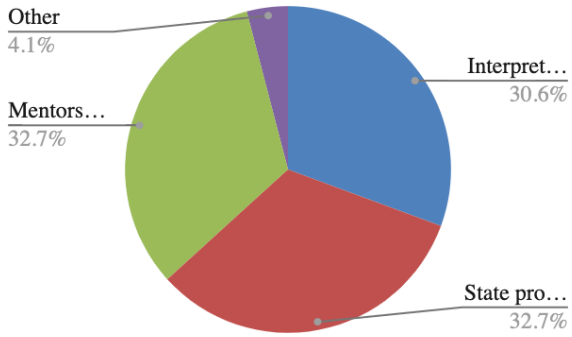
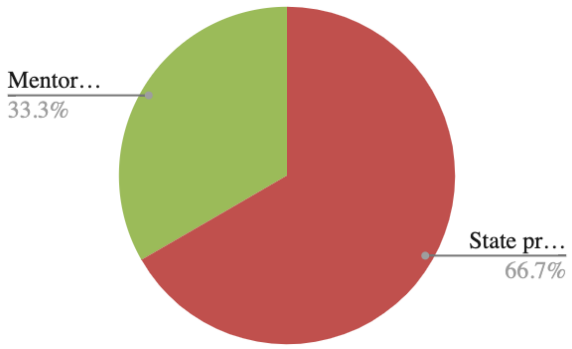
Generally, what is the relationship like between interpreting agencies and hiring entities in your state?

Interpreting Agencies	Hiring Entities
	

How easy is it for you to find interpreting work in your state?
How easy is it for you to find interpreters to fill requests?

ASL Interpreters (finding work)	Interpreting Agencies (finding interpreters)
	

What should be provided in your state in terms of education and training for interpreters? Select all that apply. (Interpreter training programs, State professional development opportunities, Mentorship programs, Other)

ASL Interpreters	Interpreting Agencies
	

QUESTION CATEGORY 1: CURRENT MARKET

In general, how would you describe current interpreting standards in your state?

	Percent	*Sub-sample info*
Not at all satisfactory	21.67%	*61.54% interpreters* *23.08% d/Deaf/DeafBlind/Hard of Hearing* *15.38% interpreting agencies*
Slightly satisfactory	28.33%	*47.06% d/Deaf/DeafBlind/Hard of Hearing* *41.18% interpreters* *11.76% hiring entities*
Moderately satisfactory	20%	*8.33% interpreters* *50% d/Deaf/DeafBlind/Hard of Hearing* *8.33% interpreting agencies* *33.33% hiring entities*
Very satisfactory	15%	*22% interpreters* *33% d/Deaf/DeafBlind/Hard of Hearing* *22% interpreting agencies* *22% hiring entities*
I do not have enough information to respond	15%	*89% hiring entities*

How would you rate the level of collaboration among organizations/groups in the interpreting community? This may include the deaf community, interpreters, agencies, the state commission for the deaf, the local professional association (Registry of Interpreters for the Deaf affiliate chapter), etc.

	Percent
No collaboration	10%
Low collaboration	28.33%
Medium collaboration	30%
High collaboration	8.33%
I do not have enough information to respond	23.33%

In general, how easy or difficult is the process to arrange for interpreting accommodations through hiring entities? (Hiring entities include agencies and companies that hire interpreters to serve D/HH/DB consumers, like government agencies, etc.)

	Percent

Very difficult	8.33%
Difficult	25%
Moderate	53.33%
Easy	11.67%
Missing (no response)	1.67%

Based on your experience, how would you rate the current behavior and practices of ASL interpreters in your state (i.e. confidentiality, respect, professionalism, etc.)?

	Percent
Very unethical and/or unprofessional	0%
Somewhat unethical and/or unprofessional	11.67%
Somewhat ethical and/or professional	51.67%
Very ethical and professional	18.33%
I do not have enough information to respond	16.67%
Missing (no response)	1.67%

What quality control mechanisms should be in place to improve the quality of ASL interpreter services? Select all that apply.

	Percent	*Sub-sample info*
Certification requirements	70%	*19.05% interpreters* *38.10% d/Deaf/DeafBlind/Hard of Hearing* *14.29% interpreting agencies* *28.57% hiring entities*
Professional development requirements	80%	*33.33% interpreters* *27.08% d/Deaf/DeafBlind/Hard of Hearing* *12.50% interpreting agencies* *27.08% hiring entities*
Ethics enforcement	61.67%	*35.14% interpreters* *24.32% d/Deaf/DeafBlind/Hard of Hearing* *13.51% interpreting agencies* *27.03% hiring entities*
Interpreter rating system	46.67%	*25% interpreters* *28.57% d/Deaf/DeafBlind/Hard of Hearing* *14.29% interpreting agencies*

		32.14% hiring entities
Ability for consumers to choose their interpreter	40%	*12.50% interpreters* *37.50% d/Deaf/DeafBlind/Hard of Hearing* *20.83% interpreting agencies* *29.17% hiring entities*
Other	8.33%	*40% interpreters* *20% d/Deaf/DeafBlind/Hard of Hearing* *20% interpreting agencies* *20% hiring entities*
I do not support setting quality control mechanisms	1.67%	*100% hiring entities*
Missing (no response)	5%	

What is the greatest challenge to advancing interpreting standards in your state?

	Percent
Insufficient interpreting training/mentorship	40%
Supply and retention of interpreters	21.67%
Current quality of interpreters	5%
Enforcement of interpreting quality	3.33%
Education of interpreting for hiring entities	5%
Clarity and consensus of ethical standards	3.33%
Collaboration among all constituents involved (deaf community, interpreters, agencies, hiring entities, government etc.)	6.67%
Other	6.67%
Missing (no response)	8.33%

What is the second greatest challenge to advancing interpreting standards in your state?

	Percent
Insufficient interpreting training/mentorship	23.33%
Supply and retention of interpreters	26.67%
Current quality of interpreters	6.67%

Enforcement of interpreting quality	5%
Education of interpreting for hiring entities	15%
Clarity and consensus of ethical standards	3.33%
Collaboration among all constituents involved (deaf community, interpreters, agencies, hiring entities, government etc.)	8.33%
Other	3.33%
Missing (no response)	8.33%

What is the level of demand or need for professional Certified Deaf Interpreters (CDI) in your state?

	Percent
No demand	3.33%
Low demand	11.67%
Moderate demand	38.33%
High demand	20%
I do not have enough information to respond	18.33%
Missing (no response)	8.33%

How would you prefer to receive information and updates about the process of establishing interpreting standards in your state? Select all that apply.

	Percent
Monthly town hall meetings	21.67%
Email newsletters	76.67%
Community workshops and events	43.33%
Social media	43.33%
Other	6.67%
Missing (no response)	8.33%

QUESTION CATEGORY 2: OVERSIGHT AUTHORITY

An oversight authority would make detailed decisions on minimum interpreting requirements and certifications. Who should be the oversight authority of interpreting standards?

	Percent	*Sub-sample info*
Your State's Commission for the Deaf	41.67%	*20% interpreters* *36% d/Deaf/DeafBlind/Hard of Hearing* *16% interpreting agencies* *28% hiring entities*
A licensing agency within the state government	25%	*40% interpreters* *33.33% d/Deaf/DeafBlind/Hard of Hearing* *6.67% interpreting agencies* *20% hiring entities*
Independent body outside the state government	16.67%	*50% interpreters* *20% d/Deaf/DeafBlind/Hard of Hearing* *10% interpreting agencies* *20% hiring entities*
Other	8.33%	*20% interpreters* *20% d/Deaf/DeafBlind/Hard of Hearing* *60% hiring entities*
Missing (no response)	8.33%	

BIVARIATE ANALYSIS:
Among BIPOC participants, who do they think should be the oversight authority of interpreting standards?

	Percent
Your State's Commission for the Deaf	57.14%
A licensing agency within the state government	14.28%
Independent body outside the state government	14.28%
Other	14.28%

How important is it to you that the oversight authority group be independent and work to reduce bias in its decision-making process on matters that affect your state's interpreting profession?

	Percent
Not important	6.67%

Slightly important	3.33%
Moderately important	21.67%
Very important	60%
Missing (no response)	8.33%

How important is it to you that the oversight authority group include Deaf, Hard of Hearing, and/or DeafBlind decision makers who are familiar with the needs of the deaf community?

	Percent
Not important	3.33%
Slightly important	5%
Moderately important	16.67%
Very important	65%
Missing (no response)	10%

How important is it to you that the oversight authority group include decision makers with expertise in licensure and regulations?

	Percent
Not important	5%
Slightly important	10%
Moderately important	26.67%
Very important	48.33%
Missing (no response)	10%

How important is it to you that the oversight authority group include decision makers with expertise in ASL interpreting?

	Percent
Not important	3.33%
Slightly important	1.67%

Moderately important	11.67%
Very important	73.33%
Missing (no response)	10%

How important is it to you that the oversight authority group include decision makers with expertise in K-12 educational interpreting?

	Percent
Not important	6.67%
Slightly important	6.67%
Moderately important	13.33%
Very important	63.33%
Missing (no response)	10%

QUESTION CATEGORY 3: REGULATORY APPROACH

Imagine you are at the hospital and encounter an interpreter who can only fingerspell. You want to file a complaint/grievance; how would you prefer this complaint be handled?

	Percent	*Sub-sample info*
Inform an oversight authority to take care of it for me	58.33%	*28.57% interpreters* *40% d/Deaf/DeafBlind/Hard of Hearing* *5.71% interpreting agencies* *25.71% hiring entities*
Take care of it myself by suing the interpreter, agency, or hospital responsible	3.33%	*50% interpreting agencies* *50% hiring entities*
Bring up the concerns directly with the interpreter	20%	*41.67% interpreters* *8.33% d/Deaf/DeafBlind/Hard of Hearing* *16.67% interpreting agencies* *33.33% hiring entities*
I do not support regulation of interpreters; I would not file a complaint	1.67%	*100% interpreting agencies*
Other	6.67%	*25% interpreter* *50% d/Deaf/DeafBlind/Hard of Hearing* *25% hiring entities*
Missing (no response)	10%	

How comfortable would you feel filing a complaint/grievance based on unprofessional or unethical behavior by an interpreter?

	Percent
Not comfortable	6.67%
Slightly comfortable	15%
Moderately comfortable	33.33%
Very comfortable	33.33%
I do not support regulation of interpreters; I would not file a complaint	1.67%
Missing (no response)	10%

What situations should call for a permit or waiver (i.e. situations that would make exceptions for interpreters to meet state standards)? Select all that apply.

	Percent

Religious services	46.67%
National conferences hosted in your state	25%
Nonprofit organization events	31.67%
Educational settings	18.33%
Community/social events	40%
Deaf interpreters (due to lack of supply of Certified Deaf Interpreters)	43.33%
Other	13.33%
Missing (no response)	10%
TOTAL	228%

What is your perspective on this option of implementing the state's regulations: a list of qualified interpreters should be publicly available to make it possible for consumers and hiring entities to determine and choose interpreters that meet minimum standards and their needs?

	Percent	*Sub-sample info*
Strongly disagree	3.33%	*50% d/Deaf/DeafBlind/Hard of Hearing* *50% hiring entities*
Disagree	6.67%	*75% interpreters* *25% hiring entities*
Agree	48.33%	*31.03% interpreters* *37.93% d/Deaf/DeafBlind/Hard of Hearing* *10.34% interpreting agencies* *20.69% hiring entities*
Strongly Agree	26.67%	*25% interpreters* *31.25% d/Deaf/DeafBlind/Hard of Hearing* *12.50% interpreting agencies* *31.25% hiring entities*
I do not support regulation of interpreters	3.33%	*100% hiring entities*
Missing (no response)	11.67%	

What is your perspective on this option of implementing the state's regulations: grievances should go through the state agency (a state process for receiving and handling complaints)?

	Percent	*Sub-sample info*

Strongly disagree	5%	*66.67% interpreters* *33.33% hiring entities*
Disagree	13.33%	*25% interpreters* *37.5% d/Deaf/DeafBlind/Hard of Hearing* *37.5 hiring entities*
Agree	48.33%	*34.48% interpreters* *34.48% d/Deaf/DeafBlind/Hard of Hearing* *3.45% interpreting agencies* *27.59% hiring entities*
Strongly Agree	18.33%	*18.18% interpreters* *36.36% d/Deaf/DeafBlind/Hard of Hearing* *36.36% interpreting agencies* *9.09% hiring entities*
I do not support regulation of interpreters	3.33%	*100% hiring entities*
Missing (no response)	11.67%	

What is your perspective on this option of implementing the state's regulations: an individual (consumer, interpreter, etc.) should take legal action through the state's court/judiciary system directly against interpreters who do not meet established standards?

	Percent	*Sub-sample info*
Strongly disagree	11.67%	*42.86% interpreters* *57.14% hiring entities*
Disagree	38.33%	*43.48% interpreters* *26.09% d/Deaf/DeafBlind/Hard of Hearing* *4.35% interpreting agencies* *26.09% hiring entities*
Agree	30%	*16.67% interpreters* *50% d/Deaf/DeafBlind/Hard of Hearing* *16.67% interpreting agencies* *16.67% hiring entities*
Strongly Agree	5%	*66.67% d/Deaf/DeafBlind/Hard of Hearing* *33.33% interpreting agencies*
I do not support regulation of interpreters	3.33%	*100% hiring entities*
Missing (no response)	11.67%	

What is your perspective on this option of implementing the state's regulations: establish professional development requirements for interpreters (list of requirements interpreters have to meet on a timely basis (i.e. earn CEU credits over a period of time and renewal)?

	Percent	*Sub-sample info*
Strongly disagree	1.67%	*100% hiring entities*
Disagree	5%	*33.33% interpreters* *33.33% d/Deaf/DeafBlind/Hard of Hearing* *33.33% hiring entities*
Agree	48.33%	*34.48% interpreters* *31.03% d/Deaf/DeafBlind/Hard of Hearing* *10.34% interpreting agencies* *24.14% hiring entities*
Strongly Agree	28.33%	*29.41% interpreters* *41.18% d/Deaf/DeafBlind/Hard of Hearing* *11.76% interpreting agencies* *17.65% hiring entities*
I do not support regulation of interpreters	5%	*100% hiring entities*
Missing (no response)	11.67%	

QUESTION CATEGORY 4: SPECIALIZATIONS

Which fields of specialization, such as medical, mental health, legal/courts, and/or education, if any, should be considered when establishing stand-alone and specialized minimum interpreting standards in your state? Select all that apply.

	Percent
Medical	61.67%
Mental Health	63.33%
Legal/Courts	66.67%
Education	61.67%
DeafBlind	48.33%
Deaf Interpreter	45%
Vocational Rehabilitation	28.33%
VRS/VRI	30%
ASL/Spanish/English	41.67%
Other	8.33%
Missing (no response)	15%

DEMOGRAPHICS

Sample size by audience group:

	Percent
Interpreters	30%
d/Deaf/DeafBlind/Hard of Hearing	33.3%
Interpreting Agencies	10%
Hiring Entities	26.7%

In total, how long have you lived in your state?

	Percent
0 - 3 years	1.7%
3 - 7 years	3.3%
7 - 10 years	5%
10+ years	90%

What is your age group?

	Percent
18-25	5%
26-34	6.67%
35-49	45%
50-64	26.67%
65-74	1.67%
75+	0%
Missing (no response)	15%

Please choose the gender identity you currently identify with.

	Percent
Man	8.33%

Woman	66.67%
Transgender woman	0%
Transgender man	0%
Non-Binary/non-conforming	1.67%
Other	0%
Prefer not to answer	6.67%
Missing (no response)	16.67%

Which race/ethnicity do you most identify with?

	Percent
African American/Black	10%
Asian/Asian American	0%
Biracial	0%
Caucasian/White	65%
Hispanic/Latino/a/x/e	1.67%
Middle Eastern/North African	0%
Multiracial	0%
Native American/American	0%
Indian/Alaska Native	0%
Native Hawaiian/Pacific Islander	0%
Other	0%
Prefer not to answer	6.67%
Missing (no response)	16.67%

What is the highest grade or level of schooling you have completed?

	Percent

Some high school	1.67%
High school	6.67%
Associate degree	5%
Bachelor’s degree	35%
Master’s degree	23.33%
Ph.D. or higher	3.33%
Trade school	0%
Prefer not to answer	8.33%
Missing (no response)	16.67%

BIVARIATE ANALYSIS:

Highest grade or level of schooling completed among interpreters:

	Percent
Some high school	0%
High school	5.56%
Associate degree	11.11%
Bachelor’s degree	22.22%
Master’s degree	22.22%
Ph.D. or higher	0%
Trade school	0%
Prefer not to answer	16.67%
Missing (no response)	22.22%

What is your annual household income?

	Percent
Less than $25,000	5%
$25,000-$50,000	16.67%

$50,000-$75,000	16.67%
$75,000-$100,000	6.67%
$100,000-$200,000	15%
More than $200,000	6.67%
Prefer not to answer	11.67%
Missing (no response)	21.67%
TOTAL	100%

What is your current employment status?

	Percent
Employed full-time	53.33%
Employed part-time	11.67%
Unemployed	0%
Seeking opportunities	0%
Stay-at-home-parent	1.67%
Retired	5%
SSI/SSDI	0%
Student	3.33%
Other	1.67%
Prefer not to answer	1.67%
Missing (no response)	21.67%

What is your primary language of use?

	Percent
American Sign Language	21.67%
Spoken English	50%

Tactile ASL	0%
Other	6.67%
Missing (no response)	21.67%

I consider myself to be:

	Percent
A non-signer	25%
A new/emerging signer	1.67%
A signer	15%
A fluent signer	31.67%
Prefer not to answer	5%
Missing (no response)	21.67%

I consider myself to be:

	Percent
Deaf	18.33%
Hard of Hearing	8.33%
DeafDisabled	0%
DeafBlind/Low-Vision	1.67%
CODA	3.33%
Hearing	30%
Other	15%
Missing (no response)	23.33%

APPENDIX D: ASL COURSE ENROLLMENT, 1990-2016

AMERICAN SIGN LANGUAGE (ASL)

	2016 Fall	2013 Fall	2009 Fall	2006 Fall	2002 Fall	1998 Fall	1995 Fall	1990 Fall
Entire US	**107,060**	**109,567**	**92,068**	**79,744**	**60,781**	**11,420**	**4,304**	**1,602**
Alabama	467	282	245	136	108	0	0	0
Alaska	298	355	675	421	524	168	0	0
Arizona	3,184	3,335	3,321	2,902	2,708	204	348	67
Arkansas	179	531	311	389	258	37	0	0
California	23,815	25,162	26,718	21,305	17,200	2,372	1,014	743
Colorado	1,669	1,404	1,214	848	777	119	79	0
Connecticut	705	481	484	365	181	104	132	44
Delaware	20	154	76	86	0	0	95	0
District of Columbia	7,089	9,085	275	139	66	194	0	0
Florida	5,293	3,697	3,362	3,964	2,948	396	177	0
Georgia	823	274	403	216	58	0	0	0
Hawaii	211	258	134	120	159	67	36	0
Idaho	1,003	731	307	513	469	0	0	0
Illinois	2,542	2,412	2,296	1,441	878	241	133	93
Indiana	1,947	1,686	2,005	1,652	1,004	127	114	0
Iowa	1,069	893	814	1,008	444	18	0	18
Kansas	349	344	444	302	543	152	0	0
Kentucky	1,253	1,470	914	1,060	350	0	0	0
Louisiana	161	66	36	36	51	0	0	0
BOSSIER PARISH COMM C	25	20	0	0	0	0	0	0
LOUISIANA SU & A&M C, BATON ROUGE	49	0	0	0	0	0	0	0
MCNEESE SU	0	0	0	29	51	0	0	0
NICHOLLS SU (LA)	20	0	0	0	0	0	0	0
U OF LOUISIANA, MONROE	40	0	0	7	0	0	0	0
U OF NEW ORLEANS	0	0	36	0	0	0	0	0
XAVIER U OF LOUISIANA	27	46	0	0	0	0	0	0
Total institutions with enrollments	***5***	***2***	***1***	***2***	***1***	***0***	***0***	***0***
Maine	434	358	293	299	379	43	0	0
Maryland	1,764	2,221	1,617	1,146	1,015	109	0	0
Massachusetts	1,925	1,778	1,528	1,542	1,454	0	69	22
Michigan	2,790	3,223	4,372	3,562	1,866	593	193	47
Minnesota	2,602	2,590	2,308	2,053	1,834	167	101	0
Mississippi	383	100	63	82	39	0	0	0
Missouri	1,610	1,619	890	789	752	21	0	0
Montana	48	25	63	27	30	16	17	0
Nebraska	318	402	281	341	94	0	0	0
Nevada	978	1,089	838	794	517	44	126	0
New Hampshire	355	844	641	762	431	0	0	0
New Jersey	2,674	2,791	1,780	1,330	866	288	203	63
New Mexico	970	976	918	1,391	534	182	47	0
New York	7,130	7,174	6,370	5,214	3,944	955	211	62
North Carolina	2,191	2,080	1,737	1,155	891	530	120	116
North Dakota	119	236	264	190	141	12	0	0
Ohio	6,688	7,289	6,061	5,337	3,343	1,229	429	53
Oklahoma	961	1,100	1,100	1,075	821	183	0	192
Oregon	2,202	2,321	1,773	1,039	658	240	30	0
Pennsylvania	2,684	2,235	1,524	3,217	1,464	77	27	0
Rhode Island	122	127	85	135	137	0	0	0
South Carolina	650	625	384	278	149	0	0	0
South Dakota	84	110	62	97	103	0	0	0
Tennessee	731	689	388	445	219	44	0	0
Texas	6,575	6,892	5,105	3,927	3,828	664	26	0
Utah	1,587	1,757	1,827	1,879	1,748	859	66	0
Vermont	313	319	160	129	30	97	0	0
Virginia	2,094	2,079	1,772	1,440	1,718	14	67	0
Washington	2,560	2,293	2,255	2,085	2,075	803	419	82
West Virginia	299	374	519	175	223	0	0	0
Wisconsin	966	961	781	638	652	12	0	0
Wyoming	176	270	275	268	100	39	25	0

Revise search | Start over