

S U N R I S E   R E V I E W

INTERPRETERS FOR THE DEAF

Submitted by  
The Colorado Department of Regulatory Agencies  
June 1991

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# STATE OF COLORADO

DEPARTMENT OF REGULATORY AGENCIES  
Office of the Executive Director  
Steven V. Berson, Executive Director

1560 Broadway  
Suite 1550  
Denver, Colorado 80202  
(303) 894-7855



Roy Romer  
Governor

May 15, 1991

The Honorable Bob Schaffer  
Joint Sunrise/Sunset Review Committee Chairman  
Room 348, State Capitol Building  
Denver, Colorado 80203

Dear Senator Schaffer:

We have completed our evaluation of the sunrise application for certification of interpreters for the deaf and are pleased to submit this written report which will be the basis for my office's oral testimony before the Sunrise and Sunset Review Committee. The report is submitted pursuant to section 24-34-104.1, Colorado Revised Statutes, 1988 Repl. Vol., (the "Sunrise Act") which provides that the Department of Regulatory Agencies shall conduct an analysis and evaluation of proposed regulation to determine whether the public needs and would benefit from the regulation.

The report discusses the question of whether there is a need for the regulation in order to protect the public from potential harm, whether regulation would serve to mitigate the potential harm and whether the public can be adequately protected by other means in a more cost effective manner.

Sincerely,



Steven V. Berson  
Executive Director

SVB/pf  
Attachment

## 1991 SUNRISE REVIEW OF THE APPLICATION FOR REGULATION OF INTERPRETERS FOR THE DEAF

By the Deaf Organizations of Colorado and  
Colorado Association for the Deaf

### INTRODUCTION

The Department of Regulatory Agencies has evaluated the proposal for regulation submitted by the Deaf Organizations of Colorado and the Colorado Association of the Deaf on December 17, 1990. Pursuant to the Colorado Sunrise Act, C.R.S. 24-4-104.1, the applicant must prove the benefit to the public of the proposal for regulation according to the following criteria:

1. Whether the unregulated practice of the occupation or profession clearly harms or endangers the health, safety or welfare of the public. Whether the potential for harm is easily recognizable and not remote or dependent on tenuous argument;
2. Whether the public needs, and can reasonably be expected to benefit from, an assurance of initial and continued professional or occupational competence;
3. Whether the public can be adequately protected by other means in a more cost-effective manner.

### METHODOLOGY

The applicants submitted answers to the sunrise application questions as well as supporting reports and other material, including letters of recommendation. A series of meetings were held with the applicants, other representatives of the deaf, interpreters, agencies and other interested professionals throughout the state to get input. In addition, there has been a review of current literature on the subject and extensive communication with local, state and federal resources. Section 504 of the Rehabilitation Act, Public Law 94-142, the Education of all Handicapped Children's Act, and Public Law 101-336 and the Americans with Disabilities Act have also been reviewed to ensure compliance with previously developed federal law.

### FINDINGS

1. Members of the deaf community have a valid concern about the current level of interpreter services available in the state.
2. Regulation of interpreters to ensure competency is supported by both consumers and the professionals who are involved with the deaf community.

3. There is data to indicate that harmful practices by interpreters for the deaf do occur in Colorado.
4. The request for regulation of interpreter services was submitted by consumers of these services in Colorado.
5. Interpreting services made available by C.R.S. 13-90-201 et. seq., have improved the services to the deaf in the legal arena but services to the deaf in other aspects of the public sector must be improved.
6. Statutes regulating interpreter services in the education systems throughout the nation are almost non-existent. In Colorado the Department of Education is clearly aware that a problem exists based on an audit of the interpreter services available to mainstreamed students statewide. The department has worked cooperatively with consumers and other service providers to develop a needed system of protecting and assuring that the deaf population have equal opportunities. However, because of the autonomous nature of each Colorado school district, a statewide system has not been implemented.

#### RECOMMENDATIONS

1. The applicants have met the burden of proving that regulation of interpreters is necessary in Colorado under the criteria set out in the Sunrise Act. Therefore, the Department of Regulatory Agencies recommends that interpreters be certified in the state of Colorado.
2. To ensure that the Colorado public school system uses certified interpreters, additional legislation must be enacted.

#### REQUEST FOR REGULATION-SUPPORTING ARGUMENTS

##### BACKGROUND

The Deaf Organizations of Colorado and the Colorado Association of the Deaf are applying for regulation under the Colorado Sunrise Act for the first time. This is the first effort on the part of the deaf community to request any form of regulation relating to interpreters; an indication of a movement occurring not only in Colorado but throughout the country to require better interpreting services to enable the members of the deaf community to more fully participate in society. This application not only impacts the deaf population but also every member of society who comes into contact with the deaf community.

##### WHAT IS DEAFNESS?

Deafness is an inability to process sound. The physical inability to handle sound affects every aspect of a person's life.

In our society there is typically an assumption that people communicate through speech. Deafness, therefore, has a devastating effect on deaf individuals' ability to participate in our society. Early deafness creates a major obstacle to mastering the English language, and unless a means of communication is established quickly, a child's ability to learn a language can be significantly affected.

A recent national study indicates that deaf children, from a very young age, show a natural response to their inability to hear. Hand movements, while random by a learning child, become more repetitive in a deaf child. In other words, deaf children "babble" with their hands as a hearing child babbles with sounds.

There are two basic approaches used with deaf children today. First is the oral approach which uses speech, lip-reading and residual hearing. This method has been most effective with children with hearing losses. There is another contingency in Colorado which teaches deaf children lip-reading skills and verbal skills so that mainstreaming is more easily accomplished. Yet many deaf individuals believe this prevents a child from becoming involved in the deaf culture and really becoming part of a community of people.

Second, is the total communication approach which encourages any form of communication including sign language. Because of the significant impact of deafness on an individual, deaf people are more likely to conjugate together because sign language enables normal communication and an environment where deafness is "normal".

The reality is that deaf people must function in a hearing world for education, employment and a variety of other services; thus, the need for interpreters is created. The interpreter is the link to the hearing world, enabling the deaf individual to be seen as one with an unhandicapped spirit and mind.

#### WHAT IS AN INTERPRETER?

To clarify the role of an interpreter, the functions of a sign language interpreter can be described in the following manner:

- A. As a "voice" for the hearing person for conversations that are signed by the deaf person faithfully and accurately. This is called "receptive skills".
- B. Sign-translate the voiced conversations of non-deaf (hearing) people faithfully and accurately via hands, fingers, arm movements, facial expressions, body language, stance and timing on a skill level that will permit a two-way, complete conversation to occur, equal in accuracy to a conversation between two or more persons.
- C. To abstain from personally participating in the conversations that they are called upon to interpret.

- D. To be non-patronizing to the deaf individuals.
- E. To maintain absolute confidentiality of interpreted conversations by not revealing the time, place, date, parties' names, conversation or topics voiced and signed by the parties involved.
- F. Be visually accessible to the deaf parties while interpreting.

Often, interpreters become interested in learning sign language through an association with deaf people. This association could be through a parent, neighbor or someone from a social situation. Sign language is primarily learned through experience, although associate and bachelor's programs have been established in recent years in response to the need. There are a variety of sign languages currently used in Colorado along with oral interpreting.

### INCIDENCE OF HARM

The incidence of harm is well documented. Interpreters are the conduit between the deaf person and the rest of society. Without competent translations, a deaf person is isolated from other people because they cannot understand the communication or are misunderstood in their attempts to respond.

Deaf people are an insular minority who have been faced with restrictions and limitations that result in social, vocational, economic and educational disadvantages. According to a recent federal study, deaf individuals are graduating from high school with a fourth grade education. Colorado has a responsibility to the deaf community to work towards equality of opportunity, independence, full participation in society and economic self-sufficiency.

There is a movement among the deaf community nationally to demand the elimination of discrimination in all aspects of a deaf person's life. With the successful organizing of deaf students at Gallaudet University in Washington, D.C., to ensure a deaf dean of the college, deaf individuals have begun the process of organizing and making their needs and rights known.

In Colorado, although harm is often not easily recognizable by the hearing community, there are many documented cases of deaf individuals who have been misinterpreted, and therefore, misunderstood.

Deaf children in the Colorado public school system have been mainstreamed or placed in regular classrooms with other children. In some areas of the state, interpreter services are provided by untrained individuals, who care deeply in many cases, but simply do not have the skills necessary to provide an adequate system of communication. In other areas of the state, interpreters are competent and provide a high quality of interpreting to children. Does it seem logical to require the licensure of teachers and yet have no requirements for those who

communicate the information provided by a teacher to a deaf student? The purpose of this request for regulation is to bring consistency of competency.

Concurrent with the review of this application, the Colorado Department of Education is creating a more effective system of identifying deaf and hard of hearing children and their needs. This system is being created in response to recommendations of the Legislature Audit Committee Report of 1989 and to the need identified by Colorado Department of Education personnel.

The Colorado Department of Education Special Education personnel has expressed a real concern for the deaf children in the Colorado public school system and a commitment to improving current services expectations and a method of identifying an interpreter's level of competency. Imagine the following scenario to help you better understand the impact of poor interpreting on a child's access to society.

Excellent Skills: The golden-kerneled pecan, like turkey and corn pudding, is a native American contribution to the world's fine foods. These stately native trees, a member of the hickory family, grow wild from Illinois to the Gulf. The largest forests are found along the river banks of the lower Mississippi Valley.

Good Skills: The pecan, like turkey and corn pudding, is a native American contribution to the world's fine foods. These native trees grow wild from Illinois to the Gulf. The largest forests are found along the river banks of the lower Mississippi Valley.

Fair Skills: The pecan is a native American contribution to the world's fine foods. These native trees grow wild from Illinois to the Gulf. The largest forests are found along the Mississippi Valley.

Poor Skills: The pecan is an American contribution to the world's foods. The largest forests are found in Mississippi Valley.

(This example was provided by Carol Sponable who wrote a letter of support with this application.)

The different levels of interpreter skills indicate the different perceptions of the world a child receives.

If a child has a poor interpreter, the child will become bored, have trouble utilizing a normal classroom setting and become a potential drop-out. The percentage of deaf individuals who receive Supplemental Security Income or some other type of state funding is inordinately high. Approximately 60% of the deaf population of Colorado are unemployed or underemployed.



In work settings throughout Colorado, deaf individuals have been passed over for promotions, misunderstood in training programs and provided incorrect training information due to poor interpreter services. Interpreters hired to interpret in public settings, such as state established committees, have been unable to read the signs of the deaf participant and thereby interfered with the deaf person's ability to participate fully.

With a need to provide interpreter's services, the Centers on Deafness were established to provide information on how to obtain interpreters, to provide referrals for interpreters, and to provide a variety of other services including advocacy, sign language classes and educational workshops. Although interpreters are provided through these agencies they do not represent a majority of the interpreters in Colorado. Yet, the primary problem identified by the applicants is the fact that there is no statewide evaluation procedure in Colorado to identify skills. This lack of identification of skill levels prevents the deaf population of Colorado, employers, agencies, etc., from accessing interpreter services at the appropriate skill level. Many deaf individuals have expressed the passionate belief that having no interpreter is better than having a bad interpreter.

There seems to be a consensus among the deaf population of Colorado and service providers to the deaf population, that the ultimate goal of any form of regulation is the provision of a communication system to the deaf community. The methodology of providing this service is the most complicated question. Some members of the deaf community have recommended Registry of Interpreters for the Deaf (RID) certification as the basic standard of evaluation. This is a national certification procedure developed by a private organization that includes a written test on deaf culture and a two-day videotaped test on actual interpreting ability. The performance test is actually two completely separate tests. One is called the Certificate of Interpreter's test which tests a candidate's ability to interpret between American sign language and spoken English. The other test is called the Certificate of Transliteration, and tests a candidate's ability to transliterate between signed English and spoken English. Currently, there are 40 RID certified interpreters in Colorado. This particular test evaluates the skill level of interpreters who are using American Sign Language and deals with no other method of communication used by the deaf.

### DEMOGRAPHICS

To effectively evaluate the need for this service, some demographic data is necessary. There are approximately 13,500 deaf people in Colorado. Approximately 60% of that population lives in the Denver area, 30% in the Colorado Springs area and 10% spread throughout the state. There appears to be a small grouping in the Grand Junction area of approximately 35



people. To focus specifically on the school system, there are approximately 120 children at the Colorado School for the Deaf and Blind, including both blind and deaf children. There are 1,417 Deaf individuals in the Colorado public school system, 330 with an additional handicap, and 386 using sign language in the school setting, although there is no information on the number who are using interpreter services. There are apparently 114 interpreters in the Colorado public school system throughout the state, with only two RID certified interpreters currently employed by the public school system. (These statistics include those students whose hearing loss has an impact on their ability to learn without special assistance).

### LAWS THAT IMPACT ON INTERPRETER SERVICES

Interpreting for deaf students in the schools is a fairly recent development, having begun only 25 years ago. It is both a result of, and an enabling component of, the mainstreaming movement for deaf students. A number of laws promulgated on the national level have stimulated an interest in deaf students. Public Law 94-142 is the Education for All Handicapped Children Act which mandates that a child has a right to a free appropriate public education in the least restrictive environment. In 1992, Public Law 101-336, commonly called the Americans with Disabilities Act, goes into effect and mandates that private companies with 25 or more employees will be required to make "reasonable accommodations" to the known physical or mental limitations of a qualified applicant or employee. This includes interpreters for the deaf unless "undue hardship" can be shown. By 1992, employers with 10 to 15 employees must also comply with the law.

The movement to improve services to the deaf began in the 1960's and gained impetus through Section 504 of the Vocational Rehabilitation Act of 1973 (amended in 1986). Pursuant to Section 504 of the Rehabilitation Act of 1973 and Section 122(a) of the State and Local Fiscal Assistance Act of 1972, all city, state and local government agencies are required to ensure effective communication with deaf people. This means that all of the above listed entities are required to provide auxiliary aids to enable deaf people to benefit equally from available services. Auxiliary aids include sign language interpreters.

In Colorado, C.R.S. 13-90-201 et. seq., requires that "qualified interpreters" be used in certain circumstances primarily focusing on legal proceedings. The regulations promulgated by the Department of Social Services establish five levels of interpreter ability using the RID standard as the base. This regulation deals specifically with legal proceedings, during which a high level of proficiency is essential to ensure fair representation.

### IDENTIFYING THE NEED

In Colorado, there has been active participation on a variety of levels to review interpreter services and establish policies to ensure that discrimination is not occurring in the public arena.

For example, under the auspices of the Rehabilitation Services Division of the Department of Social Services, a Task Force on Interpreter Issues for State Agencies was initiated several years ago. It became defunct because of the lack of staff support and became operational again in March of 1990. This task force was developed in response to the identified need for interpreter services, a standard interpreter policy, and an understanding of what interpreting means at the state level. The task force is currently considering the most appropriate response to the identified need for interpreter services in state agencies.

In addition, the Colorado public school system has studied the current level of interpreter services available in the state. Colorado is divided into administrative units for purposes of administering the public school system. These units are often comparable to the school district although some units are grouped together to coordinate special services in less populated sections of the state. There are 35 administrative units in the state and 15 coordinated service areas in the state.

Providers in 33 administrative units report that they currently have deaf or hearing impaired students in their communities who are under or inappropriately signed. Only nine administrative units report adequate services. (This information was reported in Appendices A of the Statewide Plan for Delivery of Educational Services to Children Who are Hearing Impaired, Deaf or Visually Impaired/Blind, in response to a telephone interview survey. All units did not respond).

The public school system has developed "Guidelines for Educational Interpreters" whose final draft is currently being reviewed by special education departments throughout the state. This guideline will be made available to all public school districts. Each district is then responsible to decide if and how these recommendations are implemented.

A needs assessment was implemented 1987 in conjunction with the Center on Deafness. The objectives of the survey were to verify the problems and needs of the deaf and hard of hearing population of Colorado. The results are based on responses from 218 deaf or hard of hearing individuals within Colorado.

To summarize the results of this survey relating to interpreters services, the following quote from this report is included.

"Accessibility of interpreter services is the last barrier identified by the respondents. The Center on Deafness (32%) and family members/friends (25%) are the primary sources on which deaf individuals are depending for interpreter services. When an interpreter is not available at a specific time/place, then there is a tremendous communication breakdown. This kind of interpreter service (as a communication facilitation) requires a deaf person to make arrangements prior to being on site, and to do so every time a potential

communication need arises. It is preferable to have this request for interpreter service made 48 hours prior to the need. Interpreters are also not a similar benefit in the sense of a one-time purchase charge, like a TDD or decoder. There are ongoing costs each time a professional interpreter is secured for service. It is significant to recognize the quality of interpreter services provided because not all deaf and hard of hearing individuals have similar types of communication needs. There are various levels of interpreting needs such as those who provide interpreting in manual communication (ASL, SEE, MCE, PSE), oral interpreters, covered sign interpreters for deaf-blind individuals, certified and non-certified professionals, and even a preference such as sex of the interpreters (for doctors appointments or sensitive types of situations) which creates a high selection demand for every individual. Most importantly, not all interpreters are similarly qualified in the degree of skills possessed. This makes the field to choose from very narrow."

There is currently no skill level certification system implemented on a statewide basis. Applicants are requesting such a system. Some deaf individuals have specifically expressed a desire to develop a designated time line to enable people to reach the goal of RID certification in, for example, five years. Although RID certification is a nationally recognized standard in this particular area of expertise, a number of issues have become apparent during the preparation of this report.

The RID certification test includes the following costs:

Written Test Application Fee	\$ 30.00
Written Test (Part I & Part II)	100.00
Transliteration Application Fee	30.00
Transliteration Performance Test	180.00
Interpretation Application Fee	30.00
Interpretation Performance Test	<u>180.00</u>
TOTAL	550.00

Obviously different sections of this test are taken at different times. For example, an interpreter must pass the written test to take either one of the two performance tests. Although the expense appears high in comparing this RID cost to other evaluation procedures developed by individual states, the actual cost of administering a test of this nature, whether RID or developed in-state, is approximately the same. The difference in costs reflected in fees charged to interpreters is indicative of state developed programs being supplemented with state funds while RID, being a private entity, requires the costs to be assumed by the interpreters themselves.

Although the cost factor is a relevant concern, there is a more important issue of disagreement that has become apparent. Some members of the deaf community believe that the RID certification process provides a minimal level of competency required for interpreters by the deaf population of this state. They are aware that it is necessary to give interpreters a number of years to improve their skills to this level but believe that this standard is well established and proven to be an effective tool.

A majority of deaf people and interpreters have expressed real concerns about the establishment of RID as the standard. RID is a valid evaluation tool but has been besieged with problems. Only two years ago the national organization considered bankruptcy and ultimately increased its fees by 300%. The fee increase effectively priced the RID system out of the market for the majority of interpreters in Colorado. In addition, the RID test is quite difficult and only the most experienced interpreters are able to pass it. The testing process provides no feedback to interpreters on their performance, so it does not create an effective learning opportunity to improve skills.

An example of diverging beliefs is the opinion expressed by the Center on Deafness (COD) in Greeley, which is responsible for providing interpreter services to an eight county area. They currently have two RID certified interpreters and many other interpreters who are screened by their own agency. Often COD must request Denver interpreters who are RID certified to assist in their legal interpreting according to C.R.S. 13-90-201, and they feel that the availability of help from the Denver area is quite limited. COD in Greeley has indicated that requiring RID certification could force them to close their doors. Accessibility is a critical issue. Many people in the deaf community are concerned about the impact on availability of qualified interpreters and the impact on cost to the deaf community.

In meeting with representatives of rural parts of the state, the primary fear expressed concerning the implementation of a statewide system was the development of a standard that eliminated interpreters in their areas rather than improving the services available. It is clear that most individuals involved in this issue agree that a method of identifying skill levels is critical to insure a quality of services. It is also agreed that enabling an interpreter to progress through the various skill levels is a great motivation to interpreters with feedback becoming an essential component of testing.

Another consideration is the question of American Sign Language (ASL) and other communication systems currently used in this state. The applicants believe that ASL is the only acceptable method of communication and must be the standard in this state. ASL is the primary language of the deaf community. Yet, the primary method of

communication in the school system statewide is Signing Exact English (SEE2), which is based on the English language with words presented in the same order as English is presented, while ASL is a complete language that is not based on English. The decision to use SEE2 was made in hopes of improving the deaf children's reading skills, although research has shown mixed results. Other methods of communication also used in the school system are Pidgen Signed English or Conceptually Accurate Signed English, Cued Speech, and SEE1. ASL is certainly the most used language in the deaf community, and many of the other systems are primarily ASL based, but an evaluation system must consider the full range of communication systems currently used in Colorado.

### TRAINING

In Colorado, an interpreter training program is available at Front Range Community College. This is a two-year associate program focusing on understanding deaf culture and developing a proficiency in sign language. This program prepares students to interpret in certain situations with the hope that student skills will be more fully developed through experience. Students are potentially able to pass the RID certification test after two to four years of experience after graduation. Many students choose not to take the national RID certification test because there is no real incentive, such as increased financial remuneration to do so.

Front Range Community College has actively participated in the various task forces established by the Department of Regulatory Agencies to identify the need for, and problems associated with, an interpreter evaluation system in Colorado. Front Range Community College is currently the recipient of federal funding in the amount of \$100,000 to be used to provide training opportunities in a six-state area. The College is committed to using available funding to meet identified training needs in Colorado and to closely coordinate their program with any program established by statute.

As a recent letter from an expert in the field stated, "Unfortunately, the present proposal for legislating educational interpreters in Colorado is a bit ahead of available appropriate evaluation systems." Yet Colorado is considered by many other states to be behind the times in its response to interpreters.

To effectively evaluate all interpreters an evaluation tool must have the flexibility to review all forms of communication used by the deaf.

### WHAT IS THE APPROPRIATE REGULATORY RESPONSE?

In Colorado, there is a strong consensus among the deaf community and professionals who work with the deaf, that an evaluation system for interpreters would be a significant first step in providing the deaf population of Colorado equal access.



## NATIONAL OVERVIEW

The National Association of Deaf (NAD), recently met to specifically address the interpreter issue. The outcome of this meeting is that NAD is developing a quality assurance system made up of the best aspects of previously developed programs from throughout the country. This program will include parts of the Quality Assurance Screening Test (AST) developed in Kansas and currently used in Kansas, Oklahoma, Nebraska and Arkansas, and the California Association for the Deaf test, currently used in California and South Dakota. The program is projected to be available to states by December of 1991.

In addition, an Educational Interpreter Standards Committee established as a result of the recommendations of the National Task Force on Educational Interpreting, has recommended (only a preliminary report) a number of options to consider in identifying competent interpreters. These options include RID certification, experiential options and a training program, to name a few, with a clear emphasis on a written examination in conjunction with a proficiency test (i.e., the typical proficiency test is done through the use of video tapes).

Currently, a majority of the states have statutes requiring a "qualified" interpreter in the legal setting. The word "qualified" is defined in a variety of ways, from a definition indicating standards developed by a particular state, to RID certification (Colorado currently uses RID certification standards in the legal area.)

A number of states have developed state evaluation systems to identify the skill levels of interpreters and provide this information to those who request it. Interpreting services are dealt with through a variety of administrative structures. For example, in Michigan, the Commission on Deafness is under the auspices of the Department of Labor. Their program has a fully developed system of identifying skill levels of all interpreters and publishes a yearly resource book including services for the deaf and lists of interpreters and their skill levels.

In a number of other states, Commissions have been established as private non-profit entities whose purpose is to provide interpreter evaluations and identification of skill levels.

In some states, the skill levels of educational interpreters is mandated by regulations promulgated by the Department of Education. Because of the autonomous nature of school districts in Colorado, no state mandated requirements have been implemented at this time.

## RECOMMENDATIONS

The Department of Regulatory Agencies recognizes the importance of establishing a certification program for interpreters.

Because of the variety of communication systems for the Deaf currently being used in Colorado and the lack of an available comprehensive evaluation tool, the Department of Regulatory Agencies is unable to recommend a specific structure for the needed certification program at this time. To create a statutory scheme at this time would be premature.

Therefore, the Department of Regulatory Agencies recommends the establishment of a Task Force on Interpreter Issues. This task force will seek immediate funding and work to create a comprehensive evaluation system reflected in a report to the Sunrise/Sunset Committee during its interim session in the summer of 1992. At that time, the standards of the statewide system will be clearly defined and ready for a statutory structure to be established. Changes to the education statutes will be recommended to ensure conformity with the established statewide certification program. In addition, the coordination of a statewide training program will begin through the Task Force on Interpreter issues.

This process will better ensure that the legislature enact a comprehensive law that will provide the Deaf community with the assurance of a quality program and most appropriately, prevent continued harm from occurring. Support staff for this task force will be provided by various agencies committed to this process with the Department of Regulatory Agencies playing a leadership role.

To enable this committee to understand the type of structure required for this program, a more complete description of the potential process is provided. Each interpreter will be tested on deaf culture, the role of the interpreter and ethical considerations. This test can be provided in each interpreter's home town through a proxy chosen to give the test. Next, the interpreter will be evaluated on their signing skills, their transliterating skills (ability to "voice" sign language) or their oral interpreting skills, using the interpreters primary communication method.

This portion of the test will be evaluated by a team made up of deaf individuals and interpreters. The interpreter being evaluated will be given immediate feedback on performance. This evaluation will establish the skill level at which an interpreter is functioning.



This quality assurance system, as developed by the Task Force on Interpreter Services, will be viewed as a systematic method of identifying the strengths and weakness as of interpreters who have not yet achieved national certification, provided through the Registry of Interpreters for the Deaf. The quality assurance system will identify skills at a variety of levels to be developed by the Task Force on Interpreter Services. The following levels are presented to provide examples of possible levels for interpreters.

Level one: This level should be the highest level established in the state quality assurance system. It is recommended for situations where the interpreter's skills are significant due to the nature of the arena and may not give the interpreter an opportunity to stop communication for purposes of clarification. This would include the educational/tutorial situation, appellate meetings and job interviews.

Level two: This could be considered a limited skill level and is recommended for one-to-one or small group situations where the interpreter may or may not have the opportunity to stop communication for clarification purposes. The appropriate situation for an interpreter at this level would be informal meetings and daily living skills training. Entry level educational interpreters could be hired at this level as a probationary interpreter who must then move to a higher level within a designated number of years.

Level three: This is a restricted skill level for interpreters who demonstrate basic interpreting skills and is recommended mainly for one-to-one situations where an interpreter has the opportunity to stop communication for clarification purposes. This level of interpreter would primarily be used in social/recreational situations, non-technical and informal meetings.

An additional option that the task force should consider is the establishment of a tiered system specifically applicable to the public school system. The task force could find that a number of additional skills are required to meet the needs of children in the public school system (i.e. knowledge of child development, required education background, etc.)

The importance of the educational interpreter cannot be down-played. If a deaf child is placed in a regular classroom setting, it is absolutely critical for that child to have a skilled interpreter to provide the link between the deaf child and the teacher and other students. Without this conduit, the deaf child has no real opportunity to be educated. Currently, interpreters are not respected for the skills required to provide this service. To be a skilled interpreter, it can often take 5 or 6 years to develop the necessary ability. Often interpreters are paid at the same level as playground aides. To ensure the quality of interpreters, the General Assembly must mandate a high level of proficiency for educational interpreters.

Interpreters will ultimately be placed in a particular skill level which will indicate in which situations they are qualified to perform. This list of "qualified" interpreters, their skill level and the situations in which their skills are appropriate, will be documented by the oversight authority and developed into a resource manual to be made available statewide. All RID certified interpreters will be part of the system and will be respected as the most skilled interpreters.

This system will provide feedback and give the Deaf community an opportunity to have access to interpreters with appropriate skills. Adults will use interpreters with whom they can communicate effectively but can access specific interpreters through this system when needed.

The details of such an evaluation system will be established by the task force over this year-long period of development. To clarify, it must be understood that adults will maintain their freedom of choice in choosing interpreters since the choice of an interpreter is a very individualized process. The identification of skill levels will provide resources not only for the Deaf but also for employers, agencies, etc. to draw from. Often, those who coordinate educational programs for deaf students in mainstream settings, do not have the background required to evaluate the skills of an educational interpreter, adding to the importance of a certification system.

#### Conclusion:

The establishment of a statewide evaluation system through a Task Force on Interpreter Services is a major step toward preventing public harm to the Deaf population of Colorado. The recommended procedure will ensure a well developed certification program for interpreters in Colorado.