Mr. Jim Buckheit
Executive Director
State Board of Education
333 Market Street
Harrisburg PA 17126

February 20, 2007

Dear Mr. Buckheit,

My name is Janna Walsh. I am a Certified Sign Language Interpreter. In 1995, I earned an Associates of Applied Science Degree from an Interpreter Training Program (ITP) from Front Range Community College. This college is located in Westminster, Colorado. While I attended college, Colorado was developing "The Deaf Child's Bill of Rights". I attended meetings where the very issues we are now facing in Pennsylvania, were debated, embraced, and resolved.

What I have seen and experienced in schools has brought me to my knees many nights. Our current system is not empowering people who are Deaf and hard of hearing. We must embrace **fluency**, **team work,** and **professionalism** in order to build better deaf education programs in Pennsylvania.

When I graduated, I moved to Pennsylvania to obtain a job in Lycoming County, at an elementary school. I wanted this position due to its unique nature. The two Deaf children were from a family with Deaf parents. Only about 10% of all Deaf people in America are born to Deaf parents, so I was eager to interpret for native users of American Sign Language. These children were very bright and capable, but they were not being treated according to the "rights" that I had learned about during my college years.

In 2001, I began working at a preschool with a deaf preschool aged child. I loved this setting. This girl learned sign language and how to use a professional interpreter. She began with a base of about 20 signs. She was not fluent. Her mother knew the role of an interpreter. I received full support from the child's mother, and the staff at the preschool. My ITP had prepared me to do what was needed to develop Sign Language for this preschooler. During the regular class time, I was responsible for interpreting everything around her. For about 15 minutes three times a week, we practiced signs together. All of the adults took time to explain to her, and the other children, the role of an interpreter. When she was unclear, the adults consistently clarified the role of the interpreter.

This same girl is now in fourth grade; she has a full time interpreter and is one of the top readers and spellers in her class. She has full use of both American Sign Language and the English Language. Recently, when a substitute interpreter came and did not follow the interpreter's role appropriately, this student advocated for herself. She is empowered!

In studies of language development we know that people learn best when they are immersed. The way English babies learn language is to be immersed in an English speaking family, where they hear English. Then teachers teach them to read and write, from ABC's to Shakespeare.

When speaking about Deaf children, we know 90% of them do **not** have parents or primary caregivers who are using sign language with them. Therefore, language is not available to be absorbed. Deaf children arrive at school with a wide range of language abilities/dis-abilities. I have seen them range from no language skills to fluent sign language users. Please remember when language suffers, so do social and emotional development.

Next, I would like you to consider educational requirements for teachers. Regular classroom instructors are not knowledgeable about deafness or sign language. Also, teachers of the Deaf and Hard of Hearing are required to take very few sign language classes. (I have included course curriculum from three Deaf Education colleges in Pennsylvania.) It is not possible to gain communication competence of any language in 200 and 300 level classes. It is impossible to teach a student you cannot communicate with, unless you use a proficient interpreter. The teachers do the best they can, but they have limited time, language, and resources. As a result many deaf students, without quality interpreters, are not able to speak or sign fluently enough to belong to the hearing community or the Deaf community. The solution is a **team** effort between the regular educator, the Teacher of Deaf/Hard of Hearing, and the interpreter.

According to Act 57, interpreters were required to have taken the EIPA, and passed it with a 3.5 or better. (See attached) The EIPA level 3 is considered an "intermediate level". During the 2006-2007 school year, according to Act 92, The EIPA is now a consideration of employment. I am personally aware of one school district that has placed three unqualified interpreters with young children. As a result one child will suffer the fate of little language fluency at the end of this school year. She has lost precious time! **I believe, to insure this does not happen again; you must require interpreters to obtain a degree from an Interpreter Training Program**

and score no lower than 4.0 on the EIPA. I also think as honorable educators who respect and care about the education of children, it would behoove you to place the most fluent interpreters with children at the elementary level, and **only RID Certified Interpreters** with those children that have **minimal or no language**. It is important to have the very best interpreters with young children. Give them a chance at an education, self-esteem, and friends.

As a result of unqualified interpreters, I have seen Deaf children who are losing out on precious years of education. In some cases, they grow up without the ability to function independently. These children are the adults who are then forced to rely on our government to support all their needs, through Social Security, and other government programs.

Another reason there must be strict standards for educational interpreters in schools has to do with ethical behavior. There are many isolated interpreters working in rural Pennsylvania, who are able to sign and pass a test, however, when faced with a situation that is ethical, he/she may not behave ethically. Most school districts have no administrators trained to evaluate an interpreter "on the job". Graduates of an Interpreter Training Program have interpreter peers, and ITP educators as resources, if they chose to use them. Professionals need to continue to grow and develop while in their careers.

In conclusion, I believe it is imperative that educational interpreters possess degrees from Interpreter Training Programs, take and pass, the EIPA at a proficiency of 4.0 or higher, as a minimum requirement enforced by the state of Pennsylvania. Interpreters must be identified as an essential part of the IEP team. Finally, continued professional growth, training, and education must be included in the employment status of all educational interpreters.

Please don't hesitate to contact me if you have any questions. Thank you for your time and attention in this matter.

'Signed',

Janna N. Walsh

Janna N. Walsh
Certified Sign Language Interpreter
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Pennsylvania Assessment Manual for Educational Interpreter Performance Assessment (EIPA)

Pennsylvania Training and Technical Assistance Network
Pennsylvania Department of Education
Bureau of Special Education

Table of Contents

     1. Candidate Assessment Date Confirmation
     2. Candidate Form
     3. Candidate Evaluation Form and Confidentiality Agreement
     4. EIPA Report Release Form
     5. Rating Form

I. EIPA Overview

What is the EIPA process and what are the components?

An interpreter will take the EIPA to evaluate their ability to (*a*) expressively interpret classroom content and discourse, and (*b*) receptively interpret child or teen sign language. Specially designed classroom and child-signing videotapes will be used as stimuli for the assessment. Interpreters will select either an *Elementary EIPA Assessment* or a *Secondary EIPA Assessment*.

When an appropriate grade level has been selected, the interpreter will then select the type of sign language interpreting to be used during the EIPA expressive (classroom) sample. The interpreter will choose American Sign Language (ASL), Pidgin Sign English (PSE), or Manually Coded English (MCE). The type of signing used during this sample will also determine which child-signer the interpreter will view during the receptive component of the assessment.

The EIPA has four major assessment areas:

1. Sign Intonational, Grammatical and Spatial Representation (used when signing)
2. Ability to Read Child/Teen Sign Language
3. Sign Vocabulary
4. Pragmatic Representation/Overall Behaviors

There are a total of 39 measures made during an EIPA evaluation.

II. Intended Uses

Professional Development

The primary purpose of the Educational Interpreter Performance Assessment (EIPA) is to identify areas of skill strength and need of educational interpreters. The assessment, when taken frequently, serves as a record of progress over time. An individual interpreter is encouraged to develop a personal improvement plan, based on his/her EIPA standing, which would encompass such details as coursework, mentoring, and, as the final objective, improved competence. Likewise, the interpreter is encouraged to work collaboratively with his/her program supervisor to plan appropriate staff development opportunities. The aggregate results of the EIPA are used to develop annual professional development opportunities for interpreters on a regional and statewide base by the Pennsylvania Training and Technical Assistance Network.

Job Placement

Local agencies required to fill educational interpreter positions with qualified individuals are invited to take advantage of the EIPA simulation materials for assessing the competence of prospective educational interpreters. The results could be used as one of a number of tools to foster matches between interpreters' abilities and students' needs.

If the interpreter has no employment experience and no certification, it is to the advantage of a potential hiring agency to require an EIPA as a partial means of determining ability prior to employment. The developers of the EIPA are producing a pre-employment video that employers can use to get some indication of an applicant's interpreting ability and potential success in a school setting.

If the interpreter is employed but has no certification, it is likewise to the advantage of the employing agency, as well as to the interpreter, to take the EIPA regularly as a means of monitoring improvement.

Resolving Complaints

When a complaint is lodged with Pennsylvania Department of Education (PDE) against a particular interpreter and/or a local agency, alleging that the interpreter is not appropriately trained or skilled to perform the functions required by a student's Individualized Education Plan (IEP), the agency which hired the interpreter must have the interpreter's skills assessed using a qualified independent source. The EIPA is one diagnostic tool which may be used in this situation.

The process of determining whether or not a complaint lodged against an interpreter is valid must extend beyond the confines of the EIPA. It should take into consideration such questions as the following:

- To what extent has effective rapport been established with the student?

- To what extent does the interpreter understand the academic and ethical demands of the interpreter role?

- How does the interpreter assess the language needs of the student before the assignment begins?

- How does the interpreter prepare the classroom environment and his/her placement within it?

- How does the interpreter approach the need for unanticipated daily course adjustments?

- Is the student an integral component of the educational process as a result of the interpreter's intervention?

The responses to these questions will require an on-site observation and interview conducted by a recognized educational interpreter expert. An interpreter who scores highly on the EIPA but fails to recognize the need for such strategies as those delineated here should not be considered an appropriate match for the student in question.

Scoring Explanation

EIPA scores range from zero to five (0-5), with 5 being the highest possible score. Each of the four EIPA components is scored separately (voice-to-sign, sign-to-voice, vocabulary, overall factors). These scores are averaged together to obtain an overall score.

The following descriptions are general, over-all profiles of what an interpreter may or may not be able to do when evaluated at each specific level. These profiles are summative and will not reflect the individual's specific areas of strengths or weaknesses.

1 = Beginner

The beginner demonstrates very limited sign vocabulary with frequent errors in production. Sign production may be incomprehensible. Grammatical structure tends to be nonexistent. The beginner is only able to interpret very simple voice-to-sign communication. He/she has difficulty conveying, comprehending, and interpreting signed messages. Single signs may be comprehended/interpreted, but effective communication is lost. An individual at this level is not qualified for classroom interpreting.

2 = Advanced Beginner

The advanced beginner demonstrates only basic vocabulary. Vocabulary limitations interfere with successful communication. More fluent than a Beginner, but lack of fluency still greatly interferes with the ability to communicate. Grammatically, frequent errors or non-grammatical constructions are apparent. Some use of prosody and space may be evident, but use is inconsistent and often incorrect. The advanced beginner is able to read signs at the word level, but complete sentences often require repetitions and repairs. Both voice to sign and sign to voice interpreting demonstrate serious deficiencies in the message conveyed. Without serious mentoring, an individual at this level is not qualified for classroom interpreting.

3 = Intermediate

The intermediate demonstrates knowledge of basic vocabulary, yet vocabulary would most likely be insufficient for complex topics. Sign production may be incorrect even though it may not interfere with communication. Grammatical production is emerging, but may still be incorrect. Complex grammatical productions will most likely pose a great problem. The intermediate may comprehend a signed message but may need repetition and assistance at times. Both voice-to-sign and sign-to-voice interpretations may contain all of the key points, but parts of the message may not be interpreted. An individual at this level would be able to interpret basic classroom content, but will demonstrate great difficulty conveying all information in the message and may have difficulty with interpreting complex information. An individual at this level needs supervision and should receive additional training.

4 = Advanced Intermediate

The advanced intermediate demonstrates broad use of vocabulary with sign production generally correct. The individual demonstrates strategies for conveying information when a specific sign is not in his/her vocabulary. Grammatical constructions are generally clear and consistent but complex information may still pose problems. Prosody is good. Use of space is consistent. Fluency may deteriorate when rate or complexity of input increases. Comprehension of most signed messages at a normal rate is good and sign to voice messages convey all keys points. An individual at this level would be able to interpret most classroom content but may have difficulty conveying information clearly and accurately in more complex situations.

5 = Advanced

The advanced interpreter demonstrates broad and fluent use of vocabulary and demonstrates a variety of strategies for communicating new vocabulary. Sign prosody is appropriate. The individual demonstrates full use of grammar and incorporates space correctly. Complex constructions do not pose a problem. Comprehension of signed messages is very good. An individual at this level is capable of clearly and accurately conveying the vast majority of interactions within the classroom.

Pre K-12: Special Education

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF EDUCATION
BUREAU OF SPECIAL EDUCATION
October 19, 2006

SUBJECT: Free Appropriate Public Education for Students Needing
           Educational Sign Language Interpreters

TO: School District Superintendents
           Charter School Administrators
           Approved Private School Presidents
           Intermediate Unit Executive Directors
           Intermediate Unit Special Education Directors

FROM: Linda O. Rhen, Ed.D.
           Director

Following is guidance on the recently adopted Act 92 of 2006, amending
Act 57 of 2004, Sign Language Interpreter/Transliterator State
Registration Act and the provision of a Free and Appropriate Public
Education (FAPE) for students who require interpreting or
transliterating services as per their IEPs. Act 92 deleted the
specific requirements for educational interpreters to attain a specific
score on the Educational Interpreter Performance Assessment (EIPA) (see
Endnote). As a result, interpreters and transliterators working with
students in schools, who do not meet the requirements of Act 57 of
2004, are no longer subject to potential legal sanction by the Office
of Deaf and Hard of Hearing. Nonetheless, under the longstanding
guidelines of the Department, the EIPA and an individual's score on
that assessment instrument are still key considerations for the hiring
and deployment of interpreters and transliterators by local education
agencies (LEAs).

Act 92 requires "regulations promulgated by the State Board of
Education establishing criteria for persons providing sign language
interpreting and transliterating services to students." As the State
Board of Education outlines its schedule for the regulatory process,
information will be made available regarding the timeline and
opportunities for providing input. We look at this period of time,
prior to the development of regulations, as an opportunity for local
education agencies to address training and development needs of
educational interpreters.

Until specific qualifications are developed by the State Board, LEAs
should continue to provide a high quality educational program to all
students, including those who are deaf or hard of hearing. Thus, the
Department encourages LEAs to employ individuals who meet high
standards in their field, consistent with existing guidelines, while
specific qualifications are developed. The Department also strongly
encourages individuals who currently serve as educational interpreters
to improve their knowledge and skills to best support the learning and
achievement of the students needing such services.

LEAs should also be mindful of the fact that Act 92 in no way lessens their responsibility to provide FAPE to students who require interpreting or transliterating services. The final form federal IDEA Implementing Regulations, effective October 13, 2006, include language on interpreting services:

> 300.034 Related Services (c)(4) Interpreting services includes –
>   (i)   The following, when used with respect to children who are deaf or hard of hearing: Oral transliteration services, cued language transliteration services, sign language transliteration and interpreting services, and transcription services, such as communication access real-time translation (CART), C-Print, and TypeWell; and
>   (ii)   Special interpreting services for children who are deaf-blind.

In the interest of promoting a high quality education program for students who need interpreting or transliterating services the Department makes the following recommendations:

- Although not required, the use of the EIPA will be continued as a training and assessment tool, and it is recommended that all individuals working as educational interpreters take that assessment

- For individuals who have scored 3.5 or better on the EIPA, we encourage training and development through PDE sponsored opportunities, or those offered by other recognized organizations and institutions of higher education.

- Currently employed individuals who scored below 3.5, should be provided opportunities for improvement and an individual training and development plan should be created, with specific areas identified for improvement.

- For new hires, it is suggested. that LEAs use as a minimum requirement a score of 3.5 or better on the EIPA. Until a particular EIPA score is available, an LEA can contact the EIPA Diagnostic Center to use the Pre-Hire Screening Version of the EIPA which provides an immediate answer to whether an applicant is qualified to interpret in a classroom.

- When individuals assist students as communication aides using sign language and those students are assessed on the Pennsylvania Alternate System of Assessment (PASA), the scoring on the EIPA may not be the best indicator of necessary knowledge and skills. For such individuals, LEAs should take into consideration the individual's ability to use sign language and to assist the child in educational activities.

In order to support LEAs and address training needs, the Department made training available for educational interpreters in 2005/06, and will continue and expand upon training opportunities in 2006/07. These opportunities were and will continue to be designed to improve interpreters' knowledge and skills. Information on training opportunities is available on the PaTTAN website at http://www.pattan.net/profdev/trainingcalendar.aspx.

The Department will continue to work through intermediate units to collect data regarding educational interpreters during the 2006/07 school year and will use this data to identify training needs.

Local education agencies can obtain assistance in enrolling an educational interpreter in the EIPA, or on other aspects of the EIPA from the three regional PaTTAN offices, as follows:

> PaTTAN, Pittsburgh
> Marlene Schechter-Conner, Education Consultant
> mshechter@pattan.net
> 800-446-5607
>
> PaTTAN, Harrisburg
> Carol DiMartile, Education Consultant
> cdimartile@pattan.net
> 800-360-7282
>
> PaTTAN, King of Prussia
> Susan Lindsey, Education Consultant
> slindsey@pattan.net
> 800-441-3215

The Department will continue to apprise stakeholders of progress in the regulatory process and will, from time to time, engage stakeholders in discussion and seek their input on potential requirements. LEAs should take note that the Department fully expects rigorous standards for interpreting and transliterating services to be promulgated by the State Board of Education as per Act 92 within the near future.
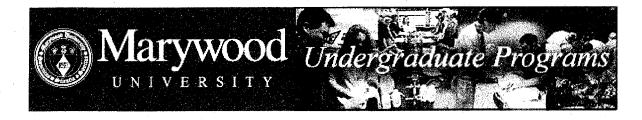
Thank you for your attention to this important matter.

EndNote:

EIPA was specified in Act 57 as a way for interpreters to be measured against the standard. The EIPA is an assessment created at the Diagnostic Center at Boys Town Research Hospital to evaluate the general interpreting skills of translators working with educators in typical mainstream classroom settings with typical D/deaf students. The assessment uses videotaped regular education classroom settings for its stimuli material.

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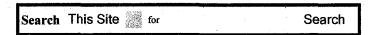Friends

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Contact Information

Course List

Course listings by semester are provided on the Registrar's site.

Course No.	Course	Credits
CSD 163	Introduction to Communication Disorders	3
CSD 164	Phonetics	3
CSD 166	Anatomy and Physiology of Speech and Hearing	4
CSD 168	Deaf Studies	2
CSD 241	American Sign Language I	3
CSD 242	American Sign Language II	3
CSD 261	Speech Science	3
CSD 265	Speech and Language Development	3
CSD 266	Introduction to Language Disorders in Children	3
CSD 270	Hearing Science	3
CSD 271	Introduction to Articulation and Phonological Disorders	3
CSD 361	Clinical Methods and Processes	3
CSD 363	Audiology	3
CSD 364	Auditory Amplification and Aural Rehabilitation	3
CSD 366	Communication Disorders in Adults	3
CSD 454	ASL-English: Bilingual Perspectives	3
CSD 468 A, B	Introductory Clinical Practicum in Speech-Language Pathology	2,2
CSD 469	Special Topics in Communication Disorders	variable

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		credit
CSD 470	Assistantship in Audiology	2
CSD 472	Practicum in Deaf Studies	2
CSD 499	Independent Study in Communication Sciences and Disorders	variable credit

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SCHOOL OF EDUCATION

University of Pittsburgh
School of Education

Hearing Impaired Instructional I Certificate > Curriculum

Education of Deaf and Hard-of-Hearing Students - Hearing Impaired Instructional I Certificate - Curriculum

Major Field Studies (42-44 credits)

Dept	Course	Title	Credits
IL	2550	LANG DVLP-DEAF/HARD OF HEARING	3
IL	2551	METH TCH ENG DEAF/HARD HEARNG	3
IL	2555	SP DVLP-DEAF/HARD OF HEARING 1	2
IL	2559	AUDTRY/VISL MGT DEAF/HARD HRNG	2
		OR	
CSD	2055	Pediatric Aural Rehabilitation	3
IL	2546	SURVEY DEAFNESS & DEAF EDUCATION	3
IL	2549	LESN DSGN INSTRUC DEF/HRD HEAR	3
IL	2558	SIGN LANGUAGE 2	3
IL	2553	AMERICAN SIGN LANGUAGE 3	3
IL	2554	ASL IN THE CLASSROOM	2
IL	2584	SPECIAL TOPICS - DEAFNESS	2
IL	2584	SPECIAL TOPICS - DEAFNESS	2
IL	2247	STRUCTR ENG & AMERCN SIGN LANG	3
		FOREIGN LANG ED; THEORY &	

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		PRAC	
IL	2257		3
		OR	
IL	2584	SPECIAL TOPICS - DEAFNESS (Bilingual Education - Deaf/Hard-of-Hearing)	3

Practicum

Dept Course	Title	Credits
	Visits to schools and agencies for deaf and hard-of-hearing	1
	Teaching labs, in which students teach mock lessons to their peers	2
	Seminar in conjunction with student teaching	1
	Student teaching	4

Contact Information

School of Education Student Service Center
5500 Wesley W. Posvar Hall
230 S. Bouquet St.
Pittsburgh, PA 15260
PHONE: 412-648-2230
FAX: 412-648-1899
EMAIL: soeinfo@pitt.edu
ONLINE (preferred): Inquiry Form
APPLICATION: Admissions Application

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Core Education Courses

To be eligible for admission into Bloomsburg University's graduate program in the Education of the Deaf and Hard of Hearing students who were not undergraduate education majors must complete five core courses in that field. The following five courses are suggested, but any five courses may be used. Contact the program director *for prior approval of the courses you select.*

THE FOLLOWING COURSES ARE SUGGESTED. A COMBINATION OF FIVE (5) EDUCATION COURSES MUST BE COMPLETED.

Course Number	Course Name	Credits Earned	Grade Earned	Semester Taken
60.291	Princ. of Teaching	3		
62.371	Teaching Reading	3		
62.391	Teaching Lang. Arts	3		
62.310	Teaching Fine Arts	3		
60.251	Psych. Found. of Ed.	3		
	more ed courses	3		
	more ed courses	3		
	more ed courses	3		
	more ed courses	3		
	more ed courses	3		

Total Credits Earned:_____

Approved By:_____

Date:_____

Notes: