



PARID

an Affiliate Chapter of the Registry of Interpreters for the Deaf

2618

Board of Directors

President
Cindi Brown, CI CT

Vice President

Treasurer
Maggie Brady, CT

Recording Secretary
Melanie Holmes, CT

Corresponding Secretary
Melissa Reihart, NAD IV CT

District Representatives

District One

District Two
Jessica Knoche, CI CT

District Three

District Four

District Five
Annie Hardway, NAD IV

District Six
Jessica Bentley-Sassaman,
CI CT

District Seven

District 8
Nichole Wade, CI CT
Megan Meiris, CI CT

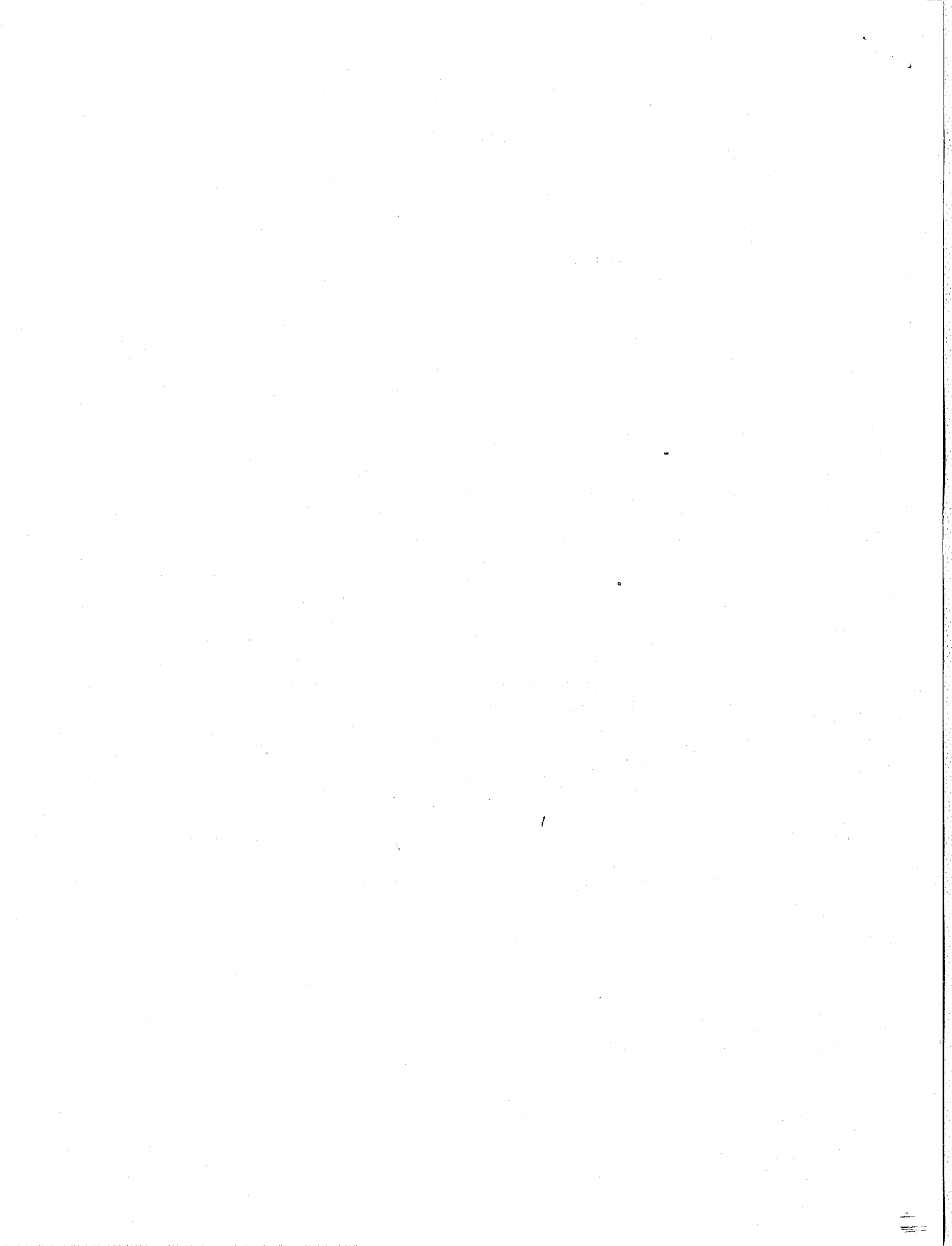
July 30, 2007

Mr. Jim Buckheit
Executive Director
State Board of Education
333 Market Street
Harrisburg, PA 17126-0333
jbuckheit@state.pa.us

Dear Mr. Buckheit,

Attached are the comments from the Pennsylvania Registry of Interpreters for the Deaf (PARID) regarding the proposed Chapter 14 regulations. If you have any questions regarding these comments, contact Cindi Brown at 570-764-3145 or president@parid.org.

Sincerely,
Cindi Brown
PARID President



Pennsylvania Registry of Interpreters for the Deaf
Comments regarding the Proposed Chapter 14 Regulations

July 30, 2007

RECEIVED

2007 AUG -2 AM 9:49

§ 14.101. Definitions.

PARID recommends adding a definition for Educational Interpreter based on the function of an interpreter. **“Educational Interpreter – An individual who provides sign language interpreting and/or transliterating services to students who are deaf or hard of hearing for instruction or other school-related activities.”**

Rationale: The Federal regulations do not provide a definition of an educational interpreter. A commenter to the federal regulations asked for a definition of an educational interpreter to be included and based on performing the function of an interpreter regardless of the person’s job title. The response from the federal level was that it is the responsibility of each state to establish the personnel qualifications. As a result, we are requesting that the State Board of Education define the term “Educational Interpreter”.

In a 2001 survey of individuals performing the duties of educational interpreters in Pennsylvania only 68% had a job title of Educational Interpreter. The remaining 32% had job titles of Interpreter Aide, Aide, or another job title. In Pennsylvania some school districts and intermediate units have already changed job titles from Educational Interpreter to something else as a result of the passage of the Sign Language Interpreter and Transliterator Registration Act (63 P. S. §§ 1725.1—1725.12).

The establishment of a definition of educational interpreter that is based on the function the person is engaged in regardless of the job title is imperative so that a loop hole is not provided for school districts and intermediate units to continue to hire individuals who do not meet the requirements of the regulations by merely changing an employee’s job title.

(The survey referred to in this section was done by Allen and Smith and printed by the Office for the Deaf and Hard of Hearing. Copies of this document are available by contacting Ms. Keiser in the Office for the Deaf and Hard of Hearing).

§ 14.105. Personnel.

(c) To serve as an educational interpreter, an individual shall meet the qualifications in paragraph (1) or (2) and paragraph (3):

(1) Achieve and provide evidence of a score of 3.5 on the Educational Interpreter Performance Assessment (EIPA) for the appropriate grade level to which the person has been assigned. PARID recommends changing the 3.5 to a 4.0 and adding “performance portion” and “sign language/system”. **“Achieve and provide evidence of a minimum score of 4.0 or higher on the performance portion of the Educational Interpreter Performance Assessment (EIPA) for the appropriate grade level and sign language/system to which the person has been assigned.”**

Rationale: The Registry of Interpreters for the Deaf has determined that individuals who hold a 4.0 or higher on the performance portion of the EIPA have met the knowledge and skills criteria to be certified members of the organization. The Boys Town National Research Hospital which administers the EIPA provides information on its website regarding the skills of individuals who achieve certain levels on the performance portion of the EIPA. Individuals who score at a Level 4 or 5 are able to interpret in the classroom independently while those at a Level 3 are still in need of supervision.

The EIPA has both a written knowledge portion and a performance portion. The regulations should denote that the minimum score of 4.0 pertains to the performance portion of the exam and no the written portion.

The performance portion of the EIPA has a total of six (6) options. It is divided into two (2) levels elementary and secondary. Each level has three (3) options of the sign language/system [American Sign Language (ASL), Pidgin Signed English (PSE), and Manually Coded English (MCE)]. ASL, PSE, and MCE are very different ways of communicating. An interpreter who can interpret effectively in ASL may not be able to interpret/transliterate effectively in PSE or MCE and vice versa. Therefore, the interpreter should be tested and score a minimum of a 4.0 on the performance portion of the EIPA that corresponds to the sign language/system used by the student(s).

(2) Be a qualified educational interpreter or qualified transliterator under the Sign Language Interpreter and Transliterator Registration Act (63 P. S. §§ 1725.1—1725.12) and its implementing regulations.

PARID recommends that this point be deleted.

Rationale: Interpreting in the K-12 educational setting is a specialty. Therefore, all interpreters who work in the educational setting should be required to hold a minimum of a 4.0 on the performance portion of the EIPA for the grade level and sign language/system of the deaf/hard of hearing student.

(3) Provide evidence of a minimum of 20 hours of staff development activities relating to interpreting or transliterating services annually.

PARID does not recommend any changes to this point.

Rationale: Professional development is essential for interpreters to continue to develop and hone their interpreting skills while staying current in the field. Twenty (20) hours of training per year is the standard for the field of interpreting.

(4) Pass the EIPA written exam by July 1, 2010.

PARID recommends adding this point.

Rationale: The EIPA written exam tests knowledge and application of core standards when interpreting for deaf and hard of hearing children in school, including ethics that are not evaluated through the performance portion of the EIPA.

(5) A time line for educational interpreters to hold a post secondary degree.

PARID recommends adding this time line.

Rationale: A post secondary degree indicates knowledge and understanding of content areas in which K-12 sign language interpreters are required to provide services. It is not practical for interpreters to do professional development for every content area in which they interpret. Therefore, a degree will assist in filling this gap.

(d) The Board, in consultation with Department, will review the EIPA score requirement every 2 years.

PARID recommends adding the Office for the Deaf and Hard of Hearing (ODHH) to this point. **“The Board, in consultation with Department and the Office for the Deaf and Hard of Hearing, will review the EIPA score requirement every 2 years.”**

Rationale: The ODHH is the Commonwealth agency that is ultimately responsible for overseeing the enforcement of the Sign Language Interpreter and Transliterator Registration Act (63 P. S. §§ 1725.1—1725.12) and its implementing regulations. The ODHH also provides advocacy, information, and referral for all agencies, businesses, and citizens of the Commonwealth. The ODHH is a tremendous resource that should be consulted during this review.