



OLR BACKGROUNDER: INTERPRETING FOR THE DEAF AND HARD OF HEARING

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This report provides information on interpreting for the deaf and hard of hearing. It includes an overview of terms and requirements for interpreting in Connecticut, a summary of interpreting requirements in three other states, and a table describing interpreter certificates.

SUMMARY

Connecticut currently requires anyone interpreting in the state to register with the Department of Rehabilitative Services (DORS) and provide certain credentials depending on the setting and type of interpreting. Several credential organizations exist or have existed over the years, offering types of credentials or exams that have also changed over time. Table 1 explains these organizations, credentials, and prerequisites for each.

States take other approaches to regulating qualified interpreters. We looked at the laws in three nearby states to provide examples. New Hampshire and Maine have statutory requirements for certification and penalties for interpreting without a certification. New Jersey, on the other hand, does not have statutory requirements for interpreters in general, but instead monitors interpreters through a state agency that maintains and provides lists of interpreters it deems qualified. Interpreters in educational settings in New Jersey must meet requirements specified in its administrative code.

INTERPRETER DEFINITIONS AND REQUIREMENTS IN CONNECTICUT

Types of Interpreting

Interpreting is defined in Connecticut statutes as the translating of English concepts to the language concepts used by a person who is deaf or hard of hearing or the translating of a deaf or hard of hearing person's language concepts to English concepts (CGS § [46a-33a\(a\)](#)). Language concepts may include American Sign

Language (ASL) or English-based sign language. Though ASL is the primary language of many deaf and hard of hearing individuals in the United States, it follows grammatical and word-order rules that are different from English rules. English-based sign language uses some ASL signs while using English word-order and grammatical rules.

Many deaf or hard of hearing individuals do not use sign language. For example, people from other countries or people who have lost their hearing at an advanced age may rely on other language concepts, including oral transliteration and cued speech. Oral transliterators use methods of communication beyond ASL, such as gestures or spelling out numbers and words, to facilitate communication. During meetings or other events with multiple speakers, people who lip-read may have difficulty identifying who is speaking and miss some of what is said as a result. An oral transliterator allows them to focus on one person. The oral transliterator may also mouth words that are easier to lip-read while preserving the meaning of what is said. Cued speech is a visual communication system developed to help raise the literacy levels of deaf individuals. It uses the mouth movements of speech in combination with cues to make all the sounds of spoken language appear different.

Deaf individuals who do not use sign language may also benefit from the use of a deaf interpreter. Certified deaf interpreters (CDIs) are deaf and act as an intermediary between a hearing interpreter and other deaf individuals. The hearing interpreter signs the speaker's message to the CDI, who then interprets that message to the deaf individual using gestures, visual aids, and other methods.

Video remote interpreting uses videoconferencing technology, equipment, and a high speed Internet connection with sufficient bandwidth to provide the services of a qualified interpreter. These interpreters are often located at call centers and provide services to people at different locations, many times across state lines.

Interpreter Requirements

Connecticut requires any person providing interpreting services in the state to register annually with DORS, which issues registration cards. When registering, interpreters must show their certifications or credentials. There are eight options (combinations of credentials, experience, and certificates) to qualify to interpret in Connecticut:

1. certification from the National Registry of Interpreters for the Deaf (RID);
2. level four or higher (on a scale of one to five, five being the highest) certification from the National Association of the Deaf (NAD);

3. a NAD-RID national interpreting certificate;
4. successful completion of (a) either the RID written generalist test or the NAD-RID certification knowledge exam, (b) level three NAD certification, and (c) two continuing education units per year for a maximum of five years of training approved by DORS before completing the RID performance exam or the NAD-RID national interpreter certification exam;
5. successful completion of (a) either RID written generalist test or NAD-RID certification knowledge exam, (b) graduation from an accredited interpreter training program, and (c) two continuing education units per year for a maximum of five years of training approved by DORS before completing the RID performance exam or the NAD-RID national interpreter certification exam;
6. for situations requiring an oral interpreter only, oral certification from RID;
7. for situations requiring a cued speech transliterator only, certification from the National Training, Evaluation, and Certification Unit (TECUnit) and successful completion of the RID written generalist test; or
8. a reverse skills certificate or a CDI certificate from RID (CGS § [46a-33a\(c\)](#)).

The first three options describe a similar qualification that has had different names at different periods of time. NAD no longer offers certifications of this kind, though at one time the organization collaborated with RID to offer a national certification. The National Interpreter Certification (NIC) offered by RID appears to be the latest version of this credential.

Options four and five describe credentials for interpreters who are in the process of obtaining their national credentials and can be held for up to five years. Options six and seven describe credentials acceptable in limited circumstances. Option eight describes credentials for CDIs.

Any person interpreting in medical settings must also register with DORS and show their credentials. Options to qualify as a medical interpreter are as follows:

1. NAD-RID national interpreting certificate;
2. comprehensive skills certificate from RID;

3. certificate of interpretation or certificate of transliteration from RID;
4. level four or higher certification from NAD;
5. reverse skills certificate or a CDI certificate from RID;
6. for situations requiring an oral interpreter only, oral certification from RID; or
7. for situations requiring a cued speech transliterator only, certification from TECUnit and successful completion of the RID written generalist test (CGS § [46a-33a\(d\)](#)).

Requirements for interpreting in legal settings are very similar to those for medical settings:

1. NAD-RID national interpreting certificate;
2. comprehensive skills certificate from RID;
3. certificate of interpretation and certificate of transliteration from RID;
4. level five certification from NAD;
5. reverse skills certificate or CDI certificate from RID;
6. for situations requiring an oral interpreter only, oral certification from RID; or
7. for situations requiring a cued speech transliterator only, certification from TECUnit and successful completion of RID written generalist test (CGS § [46a-33a\(e\)](#)).

REQUIRED INTERPRETER QUALIFICATIONS IN THREE STATES

Maine General Requirements

Maine's Department of Professional and Financial Regulation (DPFR) licenses interpreters, transliterators, and deaf interpreters. Applicants may be licensed as "limited" or "certified" (Maine Rev. Stat. Tit. 32 §§ 1521-1531). According to agency staff, both levels of certification will allow the holder to interpret in Maine, but private employers may prefer certified interpreters.

Requirements for limited licenses for interpreters and transliterators. This level of licensure requires:

1. a high school diploma;
2. references;
3. a sworn statement (of the truth and completeness of the application); and
4. proof of education and training in ASL and the interpreting process, or documentation of a score of 3.5 or higher (on a scale of one to five, five being the highest) on the Educational Interpreter Performance Assessment (EIPA).

Applicants prove education and training in ASL by submitting either:

1. proof of completion of 100 hours of instruction conducted by (a) an instructor recognized by the American Sign Language Teachers Association; (b) an interpreter certified by either RID or NAD; (c) an instructor of courses conducted through an accredited college, accredited university, or accredited or approved high school; (d) a certification maintenance course sponsor approved by RID or NAD; or (e) an instructor or interpreter certified or recognized by a comparable or successor organization to any of the above organizations as determined by DPFR, or
2. a letter signed by any of the instructors or interpreters mentioned above attesting that the applicant's skill level is equivalent to a person who has completed 100 hours of instruction in ASL.

Applicants prove education and training in the interpreting process by submitting written proof of completion of at least 100 hours of instruction in the interpreting process, which must include instruction in deaf culture and the ethics of interpreting, conducted through (1) an accredited college, accredited university, or accredited or approved high school or (2) a certification maintenance course sponsor approved by RID, NAD, or a comparable or successor organization recognized by the DPFR. Hours of instruction conducted more than five years before the date of the application are not counted.

Requirements for limited licenses for deaf interpreters. Requirements for limited licenses for deaf interpreters are very similar to those for interpreters and transliterators, with two exceptions: (1) deaf interpreters are not required to submit references and (2) deaf interpreters may only prove their education and training in ASL by submitting a letter signed by one of the approved instructors or interpreters listed above.

Requirements for certified licenses for interpreters, transliterators, and deaf interpreters. This level of license requires:

1. a high school diploma;
2. a sworn statement (of the truth and completeness of the application); and
3. documented proof of certification by RID, documented proof of a minimum level four NAD certification, or comparable certification by a comparable or successor organization recognized by the DPFR.

Continuing Education Requirements. Limited interpreters must complete at least 20 hours annually of continuing education in ASL or the interpreting process. When renewing their licenses, certified interpreters must show proof of continued certification by RID, NAD, or a comparable or successor organization recognized by the DPFR.

Enforcement and Penalties. The Office of Professional and Occupational Regulation or the attorney general may investigate complaints or allegations of unlicensed practice. Practicing without a license is a civil violation punishable by a fine of between \$1,000 and \$5,000 for each violation. Doing so intentionally, knowingly, or recklessly, or misrepresenting licensure to the public is a class E crime for the first offense, punishable by imprisonment of up to six months or a fine of up to \$1000, or a class D crime for subsequent offenses, punishable by imprisonment of up to one year or a fine of up to \$2000 (Maine Rev. Stat. Tit. 17-A §§ 1252, 1301).

The attorney general may enjoin any person practicing without a license from doing so and order the person to restore money or property to anyone who suffered losses as a result of that practice.

Exemptions. Providing communication assistance during a medical emergency does not require a license. Interpreters residing outside the state of Maine who interpret in Maine for 160 hours per year or less may do so without a license.

Related Links. <http://www.mainelegislature.org/legis/statutes/32/title32ch22sec0.html>

<http://www.mainelegislature.org/legis/statutes/10/title10sec8003-C.html>

New Jersey General Requirements

While New Jersey does not generally require interpreters to have a license or certification, the New Jersey Division of the Deaf and Hard of Hearing (DDHH) provides an interpreter service and any interpreter referred by the agency must have RID certification. The DDHH compiles lists of interpreters willing to provide services in various categories (legal, medical, youth) based on their interests.

The State Department of Education (DOE) maintains a list of interpreters qualified to work in educational settings and receives any complaints. To qualify, interpreters must have:

1. a minimum EIPA score of 3;
2. 15 semester hour credits of professional education coursework in specified topics; and
3. either (a) an associate or higher degree from a regionally accredited college or university or (b) a high school diploma or General Education Diploma (GED) and a RID or NAD certificate.

Applicants may also qualify for endorsements in oral interpreting or cued speech transliteration by submitting a certificate from an accrediting agency approved by the DOE in either topic (N.J.A.C. 6A:9-13.18).

The DOE also offers an emergency certification that may be renewed up to three times. This certification omits the requirement of professional education coursework as well as the requirement for RID or NAD certificates for those who lack a higher degree.

Related Links. <http://www.nj.gov/education/educators/license/endorsements/3463S.pdf>

<http://www.lexisnexis.com/hottopics/njcode/>

<http://www.nj.gov/humanservices/ddhh/services/>

New Hampshire General Requirements

New Hampshire requires interpreters for the deaf and hard of hearing to hold a license in order to receive remuneration and practice as an interpreter in the state. The New Hampshire Board of Licensure of Interpreters for the Deaf and Hard of Hearing, composed of nine members appointed by the governor, accepts applications for licenses and approves or denies these applications. This board, among other functions, approves and enforces performance requirements;

suspends, revokes, and renews licenses; and maintains a directory of all licensed interpreters (N. H. Stat. §§ 326-I:1 – I:18).

Generally, to receive a license, an applicant must:

1. be at least age 18;
2. pay a license fee;
3. demonstrate adherence to certain ethics and professional codes or policies; and
4. either (a) be certified by RID, the American Consortium of Certified Interpreters (ACCI), or the New Hampshire interpreter classification system program or (b) complete 30 hours of oral transliterating training divided among specified topics.

Applicants with licenses in other jurisdictions who wish to apply for a New Hampshire license must provide the board with evidence that the jurisdiction in which they are licensed maintains licensing requirements that are equal to or greater than those of New Hampshire. These applicants must also complete an application and pay a fee.

Additional Requirements in Other Settings. Interpreters working in K-12 settings for deaf or hard of hearing students in instructional or extra-curricular activities are exempt from general licensure requirements if the New Hampshire Department of Education has certified the interpreter and granted the entity (e.g., school or organization) a waiver from licensure requirements.

To be certified by the New Hampshire Department of Education, applicants must have:

1. an associate's degree or higher level of education;
2. a passing grade on the written portion of the EIPA; and
3. (a) a passing grade on the performance portion of the EIPA, (b) level three NAD certification, (c) RID national interpreting certificate, or (d) an equivalent certification from another state.

Passing scores are defined in regulations (New Hampshire Code of Administrative Rules, Ed 507.35).

Enforcement and Penalties. The New Hampshire Board of Licensure of Interpreters for the Deaf and Hard of Hearing may conduct disciplinary hearings for interpreters who engage in misconduct. These hearings may result in suspension of the interpreter’s license.

Practicing or attempting to practice interpretation without a license is a class A misdemeanor for natural persons (i.e., people) and a felony for any other person (presumably, business entities, such as corporations). Class A misdemeanors are subject to a possible jail sentence of less than one year and a fine of up to \$2,000. Felonies are subject to state prison sentences of more than one year and, for corporations or unincorporated associations, fines of up to \$100,000 (N.H. Rev. Stat. § 651:2).

Violating other provisions pertaining to interpreters, making false statements in an application for licensure, and giving false statements to the board are violations, subject to civil penalties but not imprisonment. Any subsequent violation is a class A misdemeanor, which may be subject to imprisonment, and may also be subject to a civil penalty of up to \$2,000 per offense, or, in the case of a continuing offense, \$250 for each day the violation continues (N. H. Stat. § 326-I:18).

Exemptions. Interpreters working in certain emergency situations or religious settings do not require a license. Students taking classes to learn how to interpret may interpret without a license as a part of their studies.

Nonresident interpreters certified by RID, NAD, or the ACCI (levels four and five, on a scale of one to five), who have completed RID- or NAD-approved legal interpreter training or who hold a legal specialty certificate (RID SCL:L) when working in court settings in New Hampshire are not required to be licensed, but they are subject to the board’s disciplinary authority.

Related Links. http://www.education.nh.gov/career/vocational/deaf_hh_interp_lic_bd.htm

http://www.gencourt.state.nh.us/rules/state_agencies/int100-500.html

<http://www.gencourt.state.nh.us/rsa/html/NHTOC/NHTOC-XXX-326-I.htm>

CERTIFICATIONS

Table 1 explains interpreter certifications from organizations including RID, NAD, and ACCI. The table includes the organization; the title and a description of each certification, including how it is used and whether it is currently offered; and any prerequisites.

Table 1: Interpreter Certifications

Organization	Certification	Description	Prerequisites
Registry of Interpreters for the Deaf (RID)	National Interpreter Certification (NIC)	Certification appropriate for a broad range of interpretation and transliteration assignments.	Candidates must be at least age 18 with either a bachelor's degree in any subject or an approved Educational Equivalency Application.
	Oral Transliteration Certificate (OTC)	Certification of the ability to transliterate a spoken message from a person who hears to a person who is deaf or hard-of-hearing using silent oral techniques and natural gestures, as well as the ability to understand and repeat the message and intent of the speech and mouth movements of the person who is deaf or hard-of-hearing.	None indicated.
	Certified Deaf Interpreter Certification (CDI)	Certification for interpreters who are deaf or hard of hearing. Includes specialized training or experience in the use of gesture, mime, props, drawings, and other tools to enhance communication.	Candidates must (1) be deaf or hard of hearing, as confirmed by a physician or audiologist and (2) have either a bachelor's degree in any subject or an approved Educational Equivalency Application.
	Specialist Certificate: Legal (SC:L)	Certification for legal settings certifying specialized knowledge and greater familiarity with language used in the legal system.	Candidates must satisfy all requirements in any one of the following four categories: <ol style="list-style-type: none"> 1. be a member of RID, hold a bachelor's degree in any field or an associate's degree in interpreting and at least 50 hours of legal interpreting or mentoring experience and 30 hours of formal legal training; 2. be a member of RID, hold an associate's degree in any field and at least 75 hours of legal interpreting or mentoring experience and 50 hours of formal legal training; 3. be a member of RID and have at least 100 hours of legal interpreting/mentoring experience and 70 hours of legal training; or 4. possess a current SC:L.

Table 1 (continued)

Organization	Certification	Description	Prerequisites
	Conditional Legal Interpreting Permit-Relay (CLIP-R)	RID-recognized training program designed for interpreters and transliterators who work in legal settings and who are also deaf or hard-of-hearing. This permit is valid until one year after a legal written and performance test for deaf interpreters becomes available nationally. CLIP-R holders will be required to take and pass the new legal certification examination to maintain certification in the specialized area of interpreting in legal settings. Holders of this conditional permit are recommended for a broad range of assignments in legal settings.	Candidates must have a generalist certification for interpreters and transliterators who are deaf or hard-of-hearing (RSC or CDI) prior to enrollment in the training program.
	Reverse Skill Certificate (RSC)	Certification demonstrating the ability to interpret between ASL and English-based sign language or transliterate between spoken English and a signed code for English. Holders of this certificate are deaf or hard-of-hearing and interpretation or transliteration is rendered in ASL, spoken English, a signed code for English, or written English. Holders of the RSC are recommended for a range of interpreting assignments where an interpreter who is deaf or hard-of-hearing would be beneficial.	This certification is no longer offered.
	Comprehensive Skills Certificate (CSC)	Holders of this full certification have demonstrated the ability to interpret between ASL and spoken English, and to transliterate between spoken English and an English-based sign language. Holders of this certification are recommended for a broad range of interpreting and transliterating assignments. This exam was offered from 1972 to 1988.	This certification is no longer offered.
Educational Interpreter Performance Assessment (EIPA) Center	Educational Interpreter Performance Assessment (EIPA)	Evaluation of voice-to-sign and sign-to voice skills of interpreters who work in the elementary through secondary classroom using videotape stimulus materials and a procedure that includes a comprehensive rating system. Performance is rated on a 1 (beginner) to 5 (advanced) scale.	None indicated.

Table 1 (continued)

Organization	Certification	Description	Prerequisites
National Association of the Deaf (NAD)	National Interpreter Certification	NAD certificates measuring voice-to-sign and sign-to-voice skills in general situations. A score of 3 indicates average, 4 is above average, and 5 is master. In 2005, the RID and NAD merged their certification test for interpreters, to create the NAD/RID certification, which has since been renamed NIC (see above).	This certification is no longer offered.
National Training, Evaluation and Certification Unit (TECUnit)	Cued Language Transliterater National Certification Examination (CLTNCE)	The CLTNCE includes a written and performance evaluation. Both the written and performance portions include ethical decision-making components for adhering to the tenants of the Cued Language Transliterater Code of Conduct.	Must pass two screening exams (Cued American English Competency Screening -Expressive and -Receptive). The passing scores on these screeners are valid for 18 months prior to sitting for the CLTNCE.
American Consortium of Certified Interpreters (ACCI)	ACCI test	The ACCI test is the same test administered by NAD. Levels 3, 4, and 5 are equivalent to the NAD scores.	This certification is no longer offered.

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