



January 14, 2010

Sheryl D. Emery, M.A., Director
Division on Deaf and Hard of Hearing
Department of Energy, Labor & Economic Growth
201 N. Washington SQ, STE 150
Lansing, MI 48913

Dear Ms. Emery and the Rules and Regulations Committee:

The Registry of Interpreters for the Deaf (RID) has received a copy of an early draft of the proposed Interpreter Classification system which is disconcerting to both our members in Michigan and the RID. RID has been contacted by many interpreters residing and practicing within the state of Michigan expressing grave concern that the new Michigan Interpreter Law and Classification System will have the following impact:

1. Limit working interpreter's ability to earn a living;
2. Require that nationally certified professionals, who have already met national standards by earning RID certification, pay for and take the BEI, which is being implemented to replace the state quality assurance examination; and
3. Adversely affect consumer access to interpreters in this time of interpreter shortages.

Additionally, members shared their belief that the DODHH process was very closed and that selected interpreters had information that was not shared with all stakeholders. With nearly 400 RID members living within the state of Michigan, we would urge a more open process for information distribution, feedback collection and transparency in the development of the new classification system.

Interpreter Classification System: The proposed classification places certain levels of the BEI at an equivalent level or higher than certain national credentials. This is a concern because RID and NAD national credentials are the highest level of national standards available to interpreters and because these credentials have stringent testing mechanisms, pre-exam qualifications, adherence to a code of professional conduct and certification maintenance through continuing education. Further, the NAD RID certification exams, which have been proven psychometrically sound, included thorough job analyses as a basis of the exam that were nationwide in scope.

It is RID's position that credentials from varying credentialing bodies, which are being implemented to replace an outdated quality assurance system, cannot be equivalent to RID national certification. RID certification offers a robust, long-standing, and highly respected program that includes degree requirements, adherence to a code of professional conduct, is nationwide in scope and mandates professional development.

Furthermore, for an experienced RID certified interpreter, the above referred classification and eligibility requirements outlined in the *Michigan Board for Evaluation of Interpreters (MI BEI) Study Guide* clearly limit that working interpreter's ability to earn a living within the state of Michigan. One of the benefits of RID certification is the adherence to a code of professional conduct. Tenet 2 of the code states, "Interpreters possess the professional skills and knowledge required for the specific interpreting situation." With the new classification system, Michigan, rather than the experienced working interpreter, is making that determination and eliminating the individual's responsibility to their profession.

The NAD-RID National Interpreter Certification and the RID National Certification Program works with a nationally recognized testing company, CASTLE, Worldwide, to oversee the development and revision process of the National Interpreter Certification (NIC) exam. To stay abreast of the latest in the certification community, RID maintains affiliation with the Institute for Credentialing Excellence, the entity that sets national criteria for validity, reliability and fairness in testing and credentialing.

An analysis conducted by the psychometric experts from CASTLE, Worldwide reported that the NIC Knowledge and Performance exam adheres to nationally recognized testing industry standards of validity and reliability. In each of the tests, the threshold value of .8 indicates very high reliability. Higher values indicate greater consistency among the ratings. The NIC Knowledge test had a reliability rate of .90, much higher than the accepted standard. The NIC Performance test had an even higher reliability rating at .971. Finally, the NIC Interview test showed an impressive reliability rating of .985.

To assure that our certification program remains relevant, RID conducts regular reviews of our testing instrument. Such a review is currently being conducted through the NIC Review Task Force comprised of practicing professional interpreters and consumers serving as the subject matter experts offering a broad level of experience, knowledge and skill to the work of the task force.

RID certification is highly valued within the interpreting field as well as the Deaf and hard of hearing community. As the largest national membership organization for sign language interpreters (more than 15,000 members), RID is committed to promoting and advocating for standards in the sign language interpreting profession.

In addition, we partner with the NAD to incorporate the deaf consumer perspective. NAD has representation on our Certification Council, Ethics Committee and Professional Development Committee. This relationship is crucial to the ongoing commitment to meeting the standards and needs set by the Deaf community.

For over 40 years RID has led the profession by working with our members, our consumers and the clients we serve to provide a solid foundation on which interpreters can launch and sustain careers while ensuring quality services to the Deaf community. As part of this commitment, we have worked closely and collectively with various state agencies serving deaf and hard of hearing citizens to assure that RID programs and services support their needs and not add further burden to state budgets. This approach has been successfully employed in other states while saving limited state budget expenditures from the creation of duplicate services already provided via the requirements of RID certification. We hope that RID standards, certifications, education and ethical practices systems (mediation and grievances) will continue to support Michigan citizens.

RID believes in a full-service approach to maintaining the standards of RID and NAD certified interpreters. We strongly believe that our National Certification Program is only one-third of the answer to maintaining high standards. In addition, we administer a Certification Maintenance Program (CMP) with over 130 CMP Sponsors assuring that our certified members participate in meaningful on-going continuing education; and an Ethical Practices System (EPS), based on the NAD-RID Code of Professional Conduct, providing guidance and enforcement on ethical and professional conduct. In the last year alone, the CMP processed nearly 9,000 professional development activities for our members. Our EPS, with 16 mediators and 12 of adjudicators nationwide, addresses an average of 27 cases in a typical year, at the expense of RID, not the consumer.

Kelly Flores, RID Representative to the Rules and Regulations Committee, has informed us that you are willing to share information with RID. We will provide you a separate response to the revised classification system after we have had the opportunity to thoroughly review it. We appreciate this and will honor your need to keep confidential certain aspects of the process as they are developed and prepared for distribution. We are hopeful that in working together we can prove to be a valuable resource regarding RID, RID certification and the interpreting profession. We are happy to work with you in this collaboration as we applaud the efforts in Michigan to focus on *STANDARDS* and ensure quality sign language interpreting services for the Deaf and Hard of Hearing communities within your state. Should you need more information or have any questions, please contact Janet Bailey, Government Affairs Representative at govtaffairs@rid.org.

Again, thank you for your consideration of the information provided above as you review the interpreter rules and regulations, and do not hesitate to contact us should you need more information or have further questions.

Sincerely,



Cheryl Moose, CI and CT
President



Clay Nettles, M.A., M.S.
Executive Director

cc: The Honorable Jennifer M. Granholm, Michigan Governor
Stanley "Skip" Pruss, Director, MI Department of Energy, Labor and Economic Growth
Kelly Flores, RID Secretary
Joan Gage, Michigan RID President
Leandra Williams, Region III Representative
Geri Mu, Chair, RID Certification Council
Michael Canale, Chair, RID NIC Review Task Force
Janet L. Bailey, Government Relations Representative
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Bobbie Beth Scoggins, President, National Association of the Deaf
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