



Registry of Interpreters for the Deaf, Inc.

October 1, 2010

Ms. Alana Miller  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20548  
[MillerA1@gao.gov](mailto:MillerA1@gao.gov)

Dear Ms. Miller:

As the largest national organization representing the profession of sign language interpreters, the Registry of Interpreters for the Deaf, Inc. (RID) is pleased to respond to your questions on the education of children who are deaf or hard of hearing from the perspective of the educational interpreter. RID and our members, who are committed to equal communication access in the school and in the community, are encouraged that the federal government is looking at the very complex issues inherent in deaf education in America.

Deaf or hard of hearing students were once primarily educated through schools for the deaf located throughout the United States. When deaf students were welcomed into mainstream schools, there was a need to include interpreting services to assure communication between the students, their peers, teachers and educational personnel. RID responded to the increased demand for these services by establishing a special interest group within the organization specifically for educational interpreters in 1987. In 1991, Boys Town National Research Hospital began research that led to the Educational Interpreter Performance Assessment (EIPA), a national test specifically designed to assess the skills of an educational interpreter working with children in a K-12 setting. In 2006, RID entered into an agreement with Boys Town to recognize those individuals who passed the EIPA written portion and performance assessments at the level of 4.0 or higher as certified members of RID.

There are currently no official figures available regarding the number of interpreters working in educational settings throughout the nation. Estimates range from 12,000 – 25,000 classroom interpreters providing interpretation or transliteration services for deaf or hard of hearing students. These numbers include professionals trained as educational interpreters, individuals who hold national certification and many individuals who have neither educational credentials nor interpreting certification.

Published research shows that only about 20 percent of individuals taking the EIPA meet many state department of education standards, or RID's standards. This means that many at-risk students receive a fragmented and unsatisfactorily incomplete version of classroom communication. For many of these students, the educational interpreter provides not just access to classroom communication, but often is one of the few sign language models in the school.

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Because there is no clear picture of the field, one of our recommendations is that the federal government commission a survey to ascertain the number and skill level of educational interpreters who serve deaf and hard of hearing students. The survey should look at the specific linguistic and cultural needs of the children and how they relate to the specific skills, experience and credentials of those educational personnel serving them. Once we have this information we will be better able to identify needs and more effectively distribute requirements and assistance throughout the country. We would also suggest identifying what educational interpreters are doing to help children be successful. Knowing this would lead to best practices that could be shared with the trainers of future educational interpreters.

One major challenge in educational interpreting is that we don't know enough about how interpreting in the K-12 environment differs from interpreting for adult consumers. We know there are major differences, but there has been very little systematic investigation of what the educational interpreter needs to know about education and child development, as well as interpreting, to serve as a related service provider. Most interpreters are trained to work with adults and then they must figure out the K-12 differences on their own. We would like to see the Department of Education help develop an evidence-based practice for K-12 interpreters.

RID offers the following responses to the GAO questions based on our unique perspective:

***What is known about the extent and nature of hearing loss among children in the United States?***

At the Rehabilitation Services Administration 2010 National Training Forum in August 2010, Dr. Alexa Posny, Assistant Secretary of the Office of Special Education and Rehabilitative Services, reported that the population of school age children (ages 6-21) identified as deaf or hard of hearing with Individual Education Plans (IEPs) to be 70,682. Of this number, 86.5 percent are in public schools. 62 percent of those students spend more than 80 percent of their time in the regular classroom. Another 20 percent of those students spend between 40 and 79 percent of their time in the regular classroom. Although there have been few systematic studies, some research estimates that 15-20 percent of these students use interpreting services, a number which causes us great concern.

There is an assumption that the level of hearing a student has, or the type of listening technology the student uses determines the type of services the student should receive during their school day. However, in practice the range of hearing levels do not automatically determine a student's communication preference or need. Nor does the amount of hearing automatically determine if a student will need and benefit from the use of an educational interpreter in their academic environment. If the student has no useable language, an interpreter will be of little help until the student is able to acquire sufficient language.

The ability to hear and understand, in order to be able to learn, varies from student to student along with the range of hearing loss, and the range of listening technology used. Further, the language assessments used in some areas are not specifically designed for deaf or hard of hearing students and modified versions of sound based assessments are not accurate in identifying a child's use of a visual language. A hearing loss does not, in itself, determine a student's cognitive abilities. These students may be intellectually gifted, 'average' learners or cognitively delayed.

In addition, with regard to the range of intellectual abilities, these students demonstrate a full range of communication style, strengths and needs. Many students enter school with severe delays in language abilities. The IEP team, in evaluating each student, determines the services needed for the student to benefit from their education. Some students need the service of an educational interpreter for receptive language only and are able to speak for themselves. Others may speak for themselves, but not always be understood. Still others do not choose to use their voice when talking with others, especially in large or unfamiliar groups.

The type of interpreting services may also range from an English representation of sign to American Sign Language (ASL) to speech-to-text technology, to cued speech to oral interpretation. Once again, the students' IEP team determines what services are best to meet the communication needs. This service may vary for the same student during the day depending on multiple variables.

The age, language knowledge and skill, maturity, sophistication, ability to read for comprehension, the environment and the educational setting are all factors in determining the student's need and use of a qualified educational interpreter. The educational interpreter requires an understanding of how to interpret for this intellectually diverse population as well as for students who may have an additional disability that impacts their communication and learning.

**What common technological and educational approaches are used to help deaf or hard of hearing children acquire language and literacy skills and what is known about their effectiveness?**

The most common technological approaches are the listening technologies used by deaf or hard of hearing students. These range from personal hearing aids, to a variety of FM systems to cochlear implants. Each hearing device is individually determined to enhance the student's listening ability. However, it is important to note that none of these devices enable a student to hear in all settings at the same level as their hearing classmates. While this technology supports the student's learning, it does not necessarily replace the student's need for visual access through the use of an educational interpreter. Many students with cochlear implants need and benefit from an educational interpreter in order to comprehend the spoken message in a classroom.

Captioning of video or televised materials is another valuable source of visual communication that support the student's ability to access the spoken content, often off camera, while watching the information and action presented. RID interpreters report that many of the videos used in the classroom are not captioned.

Speech to text technologies such as C-print, CART, and TypeWell are becoming more prominent in the classroom to support learning. Video remote interpreting (VRI) capabilities are also beginning to show up in educational classrooms adding new challenges and opportunities.

The implication of current and evolving technology for the interpreter working in K-12 is the lack of understanding how this technology impacts the interpreting process.

**What steps should the Department of Education take to ensure children with hearing loss receive the educational services they need?**

**Educational Interpreter Standards** A student's access to language, to their peers, and to their education is dependent on the knowledge and skill of a highly qualified educational interpreter. It is the recommendation of RID that interpreters working in K-12 classrooms be required to meet minimum qualifications.

Educational interpreters are classified as 'related service providers' in IDEA (2004). Each state defines what a highly qualified related service provider means. It would be in the best interest of the students who are deaf or hard of hearing for the federal government to provide state departments of education and educational institutions with a clear definition of the credentials (higher education and certifications) that an educational interpreter must have in order to provide appropriate services allowing equal access throughout the student's educational day.

IDEA 2004 set the bar for highly qualified staff working with children in our schools. As a result, many states set standards to determine what is meant by 'highly qualified' educational interpreters, but not all. In many states, the standards are low, and educational interpreters can obtain temporary certification without any evidence of interpreting skills. In some cases, this temporary status becomes semi-permanent. Students in rural areas may go through much of their education with a single interpreter who does not meet the established minimum standards. RID recommends that highly qualified educational interpreters meet the following standards:

1. A four-year degree that includes, but not limited to, coursework in educational standards, K-12 pedagogy, child development, child language acquisition
2. Competency in ASL and other forms of visual communication, understanding of various language approaches and process and practice of interpreting one message in one language to an equivalent message of the other language
3. National credentialing as determined by RID
4. Adherence to the National Association of the Deaf (NAD)-RID Code of Professional Conduct
5. Continuing professional development in both knowledge and skill sets

**Interpreters To Be Part of the Educational Team and the IEP Process** As 'related services providers' who are with the student all day educational interpreters are valuable to the IEP process. However, educational interpreters routinely report that they are excluded from IEP meetings and in many cases, are not even allowed to see the IEP. It is impossible for a K-12 interpreter to accommodate to a student's specific needs without knowing current skill levels and goals. It leaves the interpreter guessing. It is clear that as a related service provider, the educational interpreter should be a member of the IEP team. RID believes that the interpreters should be an integral part of the educational team supporting the deaf and hard of hearing students.

Teacher/interpreter collaboration is an important way to assure that the educational team has done everything possible to remove barriers to communication access. Assuring that the interpreter understands the teacher's learning objectives can benefit the interpreter's work. Working together they can discuss strategies that affect lesson plans and classroom activities and lead to real inclusion.

Together they can discuss how to assure linguistic exchange opportunities for the deaf or hard of hearing student.

RID strongly recommends that the Department of Education specifically delineate the educational interpreters as a participant on the IEP team.

**Resources to Support the Work of the Educational Team** Due to the nature of the work, many educational interpreters work alone and do not have adequate access to interpreting experts who can offer supervision, support and counsel. There are times when other members of the team can provide professional support. RID encourages regular contact with a supervisor or support person who has appropriate knowledge and can discuss issues pertaining to the complex nature of interpreting in educational settings.

RID also believes the educational team would benefit from expanded resources to support language acquisition and literacy for the deaf or hard of hearing students. It is recommended that each team should have access to support personnel that can model language (both signed and spoken).

In summary, RID believes that the educational interpreter's role is critical to a successful educational experience for many deaf or hard of hearing students. To that end, RID recommends the federal government assure that these professionals meet minimum standards (four-year degree, national certification and a formal continuing education program).

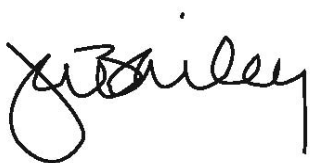
RID recommends that all interpreters have access to a supervisor who is an educational interpreter capable of supporting and counseling them in regard to their work.

RID recommends that the deaf or hard of hearing students be supported by an inclusive educational team that includes the interpreter. This would assure that all states include the interpreter in the IEP. RID also recommends that the educational team include support from experts in educating deaf students and language acquisition.

Finally, RID strongly recommends a federally commissioned study of the demographics of the nation's students and their educational support team. Finally, we have added a list of resources that may prove useful to your own team as you gather information that will allow you to best understand the very complex educational setting for deaf and hard of hearing students.

Thank you for consideration of our comments. Should you have any questions or need clarification, please do not hesitate to contact me at [govtaffairs@rid.org](mailto:govtaffairs@rid.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Janet L. Bailey". The signature is fluid and cursive, with a large loop at the end of the last name.

Janet L. Bailey  
Government Affairs Representative

## **RESOURCES Re: Educational Interpreting:**

### **Articles:**

Marschark, M., Sapere, P., Convertino, C. & Seewagen, R. (2005). Educational Interpreting: Access and Outcomes. In M. Marschark, R. Peterson and E. Winston (Eds.), *Sign Language Interpreting and Interpreter Education*. pp. 57-83. NYC, NY: Oxford University Press.

Schick, B., Williams, K., & Kupermintz, H. (2005) Look Who's Being Left Behind: Educational Interpreters and Access to Education for Deaf and Hard-of-Hearing Students . *Journal of Deaf Studies Deaf Education* (Winter 2006) 11 (1): 3-20.

Winston, E. (2004). Interpretability and Accessibility of Mainstream Classrooms. In E. Winston (Ed.), *Educational Interpreting: How It Can Succeed*, pp. 132-168. Washington, DC: Gallaudet University Press.

Winston, E. (Editor) (2005) *Educational Interpreting: How It Can Succeed*: Gallaudet University Press.

### **Books:**

Chafin Seal, B. (1997) *Best Practices in Educational Interpreting*: Allyn & Bacon.

Witter-Merithew, A., & Johnson, L. (2005). *Toward competent practice: Conversations with stakeholders*. Alexandria, VA: RID Publications.

Marschark, M. (2007). *Raising and Educating a Deaf Child*. NYC, NY: Oxford University Press

### **Papers:**

Siegel, L. (2008) *The Human Right to Language: Communication Access for Deaf Children*: Gallaudet University Press.

The National Agenda for Students who are Deaf or Hard of Hearing  
NASDE Guide on Education of Deaf/Hard of Hearing Students.

Educational Interpreter Toolkit, Published by RID  
<http://www.rid.org/content/index.cfm/AID/131>

An Overview of K-12 Educational Interpreting, RID Standard Practice Paper  
[http://www.rid.org/UserFiles/File/pdfs/Standard\\_Practice\\_Papers/K-12\\_Ed\\_SPP.pdf](http://www.rid.org/UserFiles/File/pdfs/Standard_Practice_Papers/K-12_Ed_SPP.pdf)

K-12 State Standards for Educational Interpreters. DO IT Center (2007)..

### **Organizations:**

*Deaf and Hard of Hearing Alliance*  
<http://dhhainfo.com>

*American Society for Deaf Children*  
<http://www.deafchildren.org>

*The American Speech-Language-Hearing Association (ASHA)*

<http://www.asha.org>

*Conference of Educational Administrators of Schools and Programs for the Deaf (CEASD)*

<http://www.ceasd.org>

*Convention of American Instructors of the Deaf*

<http://www.caid.org>

*Hands and Voices*

<http://www.handsandvoices.org>

*Hearing Loss Association of America*

<http://www.hearingloss.org>

*National Cued Speech Association*

<http://www.cuedspeech.org>

*EIPA - Educational Interpreter Performance Assessment*

<http://www.classroominterpreting.org/Interpreters/children/index.asp>

*Laurent Clerc National Education Center, Gallaudet University*

<http://clerccenter.gallaudet.edu>

*ED.gov, US Department of Education*

<http://www2.ed.gov/about/offices/list/ocr/docs/hq9806.html>