

Illinois Association of the Deaf

Position Statement on Interpreting Standards and Requirements

The purpose of this position statement is to acknowledge and emphasize the continued importance and need for qualified sign language interpreting services in Illinois. As there are provisions within the 225 ILCS 443, cited as the Interpreter for the Deaf Licensure Act of 2007, and corresponding rules and regulations that are now outdated, this significantly contributes to the ineffectiveness of the law as written. The Illinois Association of the Deaf (IAD) wishes to use this platform to increase awareness regarding language within 225 ILCS 443 and corresponding rules and regulations that need to be revised to better serve and support Deaf, DeafBlind and Hard of Hearing individuals.

Requirements of Accepted Certificates

The IAD recommends revising 225 ILCS 443 and associated rules and regulations to reflect all certificates and assessments accepted for licensure have psychometric documentation providing knowledge and performance examinations to obtain certification are reliable, valid and relevant in meeting the identified needs of consumers of interpreting services. Due to the nature of tests for certification often being standardized, it can be difficult to mimic an authentic interpreting environment. To this point, it is critical to establish a controlled environment, for all candidates to be presented with the same information, and for candidates to be reliably scored by raters against the same set of standards.

Consistent Regulation of Licensure

Regulatory reporting is a vital part of ensuring compliance, and this entails strict standardization of record keeping, complaint handling, processes and procedures. Standardized regulatory reporting assures customers receiving sign language interpreting services are getting a reliable and proven service. While there are Chicagoland agencies providing quality assurance, this is not the standard throughout the entire state of Illinois.

With the current absence of an interpreter coordinator at the IDHHC and IDHHC prioritizing the hire of an administrative assistant over the interpreter coordinator, the IDHHC is using alternative staff members to manage interpreter licensures. This is of concern as state resources paid for by the General Revenue Fund is being expended to manage interpreter licensures while the Interpreter for the Deaf Licensure Act of 2007 designates funds from the Interpreter for the Deaf Fund to be utilized for this work. With the mismanagement and shift in focus to interpreter licensure, this creates a continuous void and neglect of the IDHHC's core duties under the IDHHC in serving the Deaf, DeafBlind and Hard of Hearing community. At the same time, this leaves consumers vulnerable and subject to the instabilities, including continuous turnover and a lack of an interpreter coordinator, in place within the IDHHC.

Furthermore, the IDHHC has a basic understanding of sign language interpreter profession, but has minimal background knowledge and experience in regulating licenses. The lack of reasonable

turnaround time in handling license complaints also explicitly exhibits the IDHHC lacks the expertise in license regulation. The IDHHC administration also includes a licensed interpreter who has a vested interest in the outcomes related to interpreter licensure; this has raised some concerns from the Deaf and interpreting communities about IDHHC's impartiality and the objectivity of the licensure process. It is critical to ensure licensure is maintained by a competent state agency that specializes in licensure regulation and has standardized processes and procedures in place; to this point, the IAD recommends moving licensure over to the Illinois Department of Financial and Professional Regulation (IDFPR), an agency handling licensures for more than 50 other professions.

Eliminate Impartial Regulation

Currently, the IDHHC oversees the Interpreting Licensure Board and members of this board are appointed by the IDHHC Director. We recommend that in alignment with moving licensure regulation to the IDFPR, that the IDFPR have their own Interpreting Licensure Board. Furthermore, we recommend board members be appointed by the Governor and should be required to meet four (4) times a year as opposed to the current minimum requirement of two (2) times a year.

Add Emphasis on DeafBlind

The DeafBlind population is a recipient of interpretation services, but is not a recognized subset of the greater community in 225 ILCS 443. The spectrum of consumers utilizing DeafBlind interpreting services consist of individuals with differing degrees of vision loss and levels of hearing. To this point, the amount and type of vision and hearing a person has determines the type of interpreting that will be most effective for that individual. As this subset is a growing population, the IAD recommends adding language to reflect DeafBlind individuals are a valued population served by sign language interpreters required to adhere to licensure requirements and standards.

Eliminate Cued Speech from 225 ILCS 443

The inclusion of cued speech in the Interpreter for the Deaf Licensure Act of 2007 is misleading as the act focus primarily on interpretation, not transliteration services. Interpretation is the act of conveying a message from one language to another. Cued speech is not a language, but is a visual representation of a language and the transliteration process involves converting exact words into exact visual cues. The recommended elimination of cued speech from 225 ILCS 443 does not mean standards should not be implemented for cued speech transliterators; instead, new legislation should be introduced for oversight of cued speech transliterators.

Required Actions

The IAD strongly urges the Illinois Registry of the Deaf (IRID) to collaborate with members of the Deaf, DeafBlind and Hard of Hearing community to jointly develop recommendations to revise 225 ILCS 443

and corresponding rules and regulations to address and incorporate all elements in this position statement. While we appreciate any changes affect interpreters' respective livelihoods, it is our community's communication access. We are reminded of NAD's slogan of "Nothing About Us Without Us." As establishing and maintaining quality communication standards is a human right, Deaf, DeafBlind and Hard of Hearing individuals must be involved every step of the process in developing laws and regulations to be legislated and enforced.

Adopted March 12, 2017 by the Illinois Association of the Deaf Executive Board with great appreciation to the 2015-2017 Legislative Committee

Resources/References

¹ N/A (2006). Cued Speech: Myths and Facts. (pp. 1-2). National Cued Speech Association.