

# MANAGEMENT DIRECTIVE

## Commonwealth of Pennsylvania Governor's Office

<b>Subject:</b> Hiring/Contracting Sign Language Interpreters/Transliterators	<b>Number:</b> 205.32 Amended
<b>Date:</b>  September 12, 2014	<b>By Direction of:</b>  Julia K. Hearthway, Secretary of Labor and Industry
<b>Contact Agency:</b> Department of Labor and Industry, Office for the Deaf and Hard of Hearing, Telephone 717.783.4912	

**This directive establishes policy, responsibilities, and procedures for procuring the services of interpreters/transliterators for commonwealth activities. Marginal dots are excluded due to major changes.**

- 1. PURPOSE.** To establish policy, responsibilities, and procedures for procuring the services of interpreters/transliterators for commonwealth activities.
- 2. SCOPE.** This directive applies to all departments, boards, commissions, and councils (hereinafter referred to as "agencies") under the Governor's jurisdiction.
- 3. OBJECTIVE.** To ensure that interpreters/transliterators hired for commonwealth activities are state-registered with the Pennsylvania Department of Labor and Industry (L&I), Office for the Deaf and Hard of Hearing (ODHH) in compliance with the *Sign Language Interpreter and Transliterators State Registration Act (Act 57-2004)*, as amended, 63 P.S. § 1725.1 *et. seq.*
- 4. DEFINITIONS.**
  - a. Grievance.** For purposes of this directive, a grievance is a complaint by an individual or agency arising from an interpreter/transliterators related concern.
  - b. Interpreting.** The process of conveying English in grammatically correct American Sign Language (ASL), and the process of conveying ASL in grammatically correct English. The essence of interpreting is the preservation of meaning across two distinct languages, communities, and cultures, to provide optimum communication accessibility to all involved.

c. **National Certifying Bodies.** Includes the National Association of the Deaf (NAD) and the Registry of Interpreters for the Deaf, Inc. (RID). For purposes of the *Sign Language Interpreter and Transliterators State Registration Act*, an individual must possess at least one of the following certifications, to be eligible for commonwealth state-registration: Comprehensive Skills Certificate (CSC), Master Comprehensive Skills Certificate (MCSC), Certificate of Interpretation (CI), Certificate of Transliteration (CT), Certified Deaf Interpreter (CDI), National Interpreter Certification (NIC), National Interpreter Certification Advanced (NIC Advanced), National Interpreter Certification Master (NIC Master), National Association of the Deaf, Level 4, (NAD IV), and National Association of the Deaf, Level 5 (NAD V).

d. **Transliterating.** The process of conveying spoken English in an English-based sign system and the process of conveying an English-based sign system in spoken English. The essence of transliterating is the preservation of meaning between two different representations of the same language.

5. **POLICY.** When procuring interpreting/transliterating services for commonwealth activities, agencies must hire interpreters/transliterators who are state-registered with L&I, ODHH. If interpreting/transliterating services are procured through a third party, such as an interpreter referral service, commonwealth agencies must ensure that the services are being provided by an interpreter/transliterator state-registered with L&I, ODHH.

## 6. RESPONSIBILITIES.

a. **Agency Heads** shall ensure personnel responsible for procuring interpreting/transliterating services, hire interpreters/transliterators who are state-registered with L&I, ODHH.

b. **Pennsylvania Department of Labor and Industry, Office for the Deaf and Hard of Hearing** shall:

(1) Maintain a database of state-registered and provisionally registered interpreters/transliterators and publish the list of registered interpreters/transliterators at <http://www.dli.pa.gov>. Agencies can also request the list of registered interpreters/transliterators by contacting L&I, ODHH at Telephone 717-783-4912 or at [odhh@pa.gov](mailto:odhh@pa.gov).

(2) Provide technical assistance and guidance to agencies regarding the procurement of interpreting/transliterating services.

## 7. PROCEDURES.

a. An individual or agency experiencing an issue relating to an interpreter's/transliterator's skills, abilities, conduct, or breach of the Code of Professional Conduct (CPC), as promulgated by RID, should contact L&I, ODHH at Telephone 717-783-4912, for technical assistance and guidance.

- b. To file a formal grievance/complaint regarding the breach of the CPC, contact:

Registry of Interpreters for the Deaf, Inc.  
333 Commerce Street  
Alexandria, Virginia 22314  
Telephone: 703-838-0030  
TTY: 703-838-0459  
Fax: 703-838-0454  
E-mail: [ethics@rid.org](mailto:ethics@rid.org)  
Web site: [www.rid.org](http://www.rid.org)

- c. If an interpreter/transliterater is in violation of *Act 57-2004*, a formal grievance/complaint form should be filed with:

Department of Labor and Industry  
Office for the Deaf and Hard of Hearing  
1521 North 6<sup>th</sup> Street  
Harrisburg, PA 17120  
Telephone: 1-800-233-3008 voice/TTY  
Local: 717-783-4912 voice/TTY  
Videophone: 717-831-1928  
Fax: 717-783-4913  
E-mail: [odhh@pa.gov](mailto:odhh@pa.gov)  
Web site: <http://www.dli.pa.gov>

**This directive replaces, in its entirety, *Management Directive 205.32*, dated January 29, 2010.**

**Enclosure 1 - Descriptions of Certifications**

## **Descriptions of Certifications**

### **National Interpreter Certification (NIC)**

Holders must demonstrate professional knowledge and skills that meet or exceed the minimum professional standards necessary to perform in a broad range of interpretation and transliteration assignments.

Individuals who achieve the NIC level have passed the NIC Knowledge examination. They have also scored within the standard range of a professional interpreter on the interview and performance portions of the test.

### **National Interpreter Certification Advanced (NIC Advanced)**

Holders must demonstrate professional knowledge and skills that meet or exceed the minimum professional standards necessary to perform in a broad range of interpretation and transliteration assignments.

Individuals who achieved the NIC Advanced level have passed the NIC Knowledge examination; scored within the standard range of a professional interpreter on the interview portion; and scored within the high range on the performance portion of the test.

### **National Interpreter Certification Master (NIC Master)**

Holders must demonstrate professional knowledge and skills that meet or exceed the minimum professional standards necessary to perform in a broad range of interpretation and transliteration assignments.

Individuals who achieved the NIC Master level have passed the NIC Knowledge examination. They have scored within the high range of a professional interpreter on both the interview and performance portions of the test.

### **Certificate of Interpretation (CI)**

Holders of this certificate are recognized as fully certified in interpretation and have demonstrated the ability to interpret between ASL and spoken English in both sign-to-voice and voice-to-sign. The interpreter's ability to transliterate is not considered in this certification. Holders of the CI are recommended for a broad range of interpretation assignments.

### **Certificate of Transliteration (CT)**

Holders of this certificate are recognized as fully certified in transliteration and have demonstrated the ability to transliterate between English-based sign language and spoken English in both sign-to-voice and voice-to-sign. The transliterator's ability to interpret is not considered in this certification. Holders of the CT are recommended for a broad range of transliteration assignments.

## **Certified Deaf Interpreter (CDI)**

Holders of this certification are interpreters who are deaf or hard-of-hearing, and who have completed at least eight hours of training on the NAD, RID Professional Code of Conduct (PCC); eight hours of training on the role and function of an interpreter who is deaf or hard-of-hearing; and have passed a comprehensive combination of written and performance tests. Holders of this certificate are recommended for a broad range of assignments where an interpreter who is deaf or hard-of-hearing would be beneficial.

## **Comprehensive Skills Certificate (CSC)**

Holders of this full certificate 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 certificate are recommended for a broad range of interpreting and transliterating assignments.

## **Master Comprehensive Skills Certificate (MCSC)**

Holders of this certificate were required to hold the CSC prior to taking this examination. The examination was designed with the intent of testing for a higher standard of performance than the CSC. Holders of this certificate are recommended for a broad range of interpreting and transliterating assignments.

## **National Association of the Deaf (NAD)**

### **Level 4: Above Average Performance**

This person demonstrates above average skill in any given area, performance is consistent and accurate, fluency is smooth with very little deletion, and the viewer has no questions as to the candidate's competency. This person should be able to interpret well in any situation.

### **Level 5: Superior Performance (If not a native user, then could almost pass for one)**

This person demonstrates excellent to outstanding ability in any given area. Performance is practically without flaw and this is the person you would go out of your way to seek to interpret for you.