

## **Frequently Asked Questions (FAQs) and Answers Related to Educational Interpreters**

### **Q: What changes are effective on what date?**

**A:** The Michigan Endorsement requirements become effective July 7, 2016. The requirement for an EIPA Performance Score of 4.0 or above is effective September 1, 2016. After September 1, 2016, if the Division receives a first-time application for Michigan certification as an educational interpreter, the applicant must also submit proof of passage of the EIPA written test.

### **Q: Why are requirements for educational interpreters working in elementary settings (Birth to Grade 6) higher than requirements for educational interpreters working in secondary settings (Grade 7 to Age 26 with IEP or 504 Plan)?**

**A:** While instinct might suggest that as students' vocabularies increase, the requirements on interpreters will grow, Michigan requires higher standards for qualified interpreters in elementary educational settings. The reason behind this has nothing to do with the required vocabulary or the difficulty of class work, or to the *content* of communications, but rather reflect that, in addition to accurate communication, it is imperative for elementary educational interpreters to meet strict standards in order to enhance language acquisition skills for students.

When the Deaf Persons' Interpreter Act was amended to raise the standards for educational interpreting in both elementary and secondary educational settings, it was recognized that language acquisition skills of students who are deaf, deafblind, and hard of hearing is a critical element of success in elementary settings. As a result, the promulgated rules reflect a determination that interpreter qualifications are particularly important, as is an Endorsement specific to interpreting in educational settings.

Therefore, there are narrower requirements for interpreting in elementary educational settings. Interpreters working in elementary educational settings must have an Elementary Educational Endorsement, while an interpreter working in secondary educational settings may have either a Secondary or Elementary Educational Endorsement. While no student should have to rely upon anything less than a fully qualified interpreter, the Rules recognize the need is greatest when first learning to how to learn and how to communicate.

### **Q: I have a 4.0 EIPA Performance Score and my Michigan credential will indicate my ability to work in educational settings. Am I also required to obtain a Michigan Educational Endorsement?**

**A:** Yes. All educational interpreters who wish to work in elementary and secondary educational settings must maintain Michigan certification of their credential(s) and obtain an Educational Endorsement. Interpreters who are qualified to work in educational settings also must continue to obtain continuing education specifically related to educational interpreting. The endorsement indicates that the Division has independently verified the interpreter has met the mandatory CEUs as required.

**Q: Am I allowed to work with elementary students if I only have a Secondary Educational Endorsement?**

**A:** No. An interpreter with a Secondary Educational Endorsement is **not** allowed to work in elementary educational settings. However, interpreters with an Elementary Educational Endorsement may work in secondary educational settings (see above).

**Q: Will the Division provide allowances for educational interpreters who do not have a 4.0 EIPA Performance Score as of September 1, 2016?**

**A:** No. Students are entitled to qualified interpreters and school districts must provide one. The rules that define qualified interpreters state that in elementary and secondary educational settings, a 4.0 EIPA Performance Score is required. The Division cannot, and will not consider an interpreter qualified if s/he does not meet the definition outlined in the Rules. No special allowance will be granted because an interpreter is making progress or is 'almost' qualified.

After September 1, 2016, all educational interpreters with anything less than a 4.0 EIPA Performance Score **will not** be considered to be fully qualified for a position in elementary or secondary educational settings.

An interpreter with a score of 3.5 (or 3.9) CANNOT be retained by a school district IF there is a fully qualified interpreter who would accept the job. However, this does not necessarily mean that educational interpreters with scores in this range cannot work at all. Michigan Interpreter Rule 26(4) and (5) outlines specific circumstances where such interpreters who do not have an EIPA Performance Score of 4.0 may be employed as either short-term or long-term substitutes for a fully qualified interpreter in elementary or secondary educational settings.

Additionally, Michigan Interpreter Rule 27(3) outlines specific factors that school districts must adhere to if they are unable to reasonably locate a fully qualified interpreter and are requesting an exception from the Division. Educational interpreters who are going to be employed pursuant to that school district's exception must first obtain a personal exception from the Division by showing proof of both of the following: proof of receiving a 3.5 or higher EIPA Performance Score within the past 24 months and documentation of 12 additional hours of educational interpreter training (as defined in Rule 83(2)), and annual maintenance of CEUs for educational interpreting.

**Q: I have an EIPA score of 3.5 and the Rules say I may work in some educational settings, so what do I need to know?**

An interpreter with an EIPA score of 3.5 through 3.9 may obtain an "EDU3.5" Educational Certification from the Division indicating they may work in elementary or secondary educational settings. The EDU 3.5 Certification indicates that the interpreter is considered "qualified" to interpret ONLY when the Michigan Interpreter General Rules *explicitly authorize* them to do so. An appointing authority may properly consider using EDU 3.5 interpreters as substitute interpreters in specific instances or when no properly qualified educational interpreter can reasonably be located.

An “EDU3.5” certified interpreter must also have an Educational Endorsement indicating they may work in elementary (E-Ed) or secondary (S-Ed) settings.

**Q: Who is qualified to work as either long-term or short-term substitute interpreters in elementary and/or secondary educational settings?**

**A:** Requirements for interpreting in educational settings are lowered slightly for long-term substitute interpreters, and then slightly lowered again for short-term substitute interpreters. For the reasons discussed above, they are also somewhat stricter in elementary educational settings than they are in secondary educational settings. The specific requirements can be found in Rule 26, Sections (4) and (5).

**Q: As an educational interpreter, what am I required to submit for an Educational Endorsement in Michigan?**

**A:** Educational interpreters who intend to apply for an initial Elementary and/or Secondary Educational Endorsement must have earned 0.8 CEUs (8 hours) related to educational interpreting during the four years preceding the date of the Michigan Endorsement application. Educational Endorsements, once granted, will be added to the interpreter's other credentials and remain valid until the last day of the interpreter's current four-year Michigan credential cycle, provided that their Michigan certification is renewed annually. In order to renew an Educational Endorsement when the four-year Michigan credential cycle ends, the interpreter must submit 0.8 CEUs (8 hours) which were earned during their current four-year Michigan credential cycle. Educational interpreters may use the CEUs for the annual 2.0 CEU (20 hours) requirement to satisfy the 0.8 CEUs (8 hours) Educational CEU requirement at the end of their four-year Michigan credential cycle.

*Example: Interpreter A is currently certified with an EIPA Elementary credential. Interpreter A's Michigan annual renewal cycle ends on June 30 each year. Interpreter A's four-year Michigan credential cycle begins on the same date that the 2016-17 annual renewal certification cycle becomes effective: July 1, 2016 and ends on June 30, 2020. If Interpreter A obtains approval for an Elementary Educational Endorsement prior to July 1, 2016, the Endorsement will then correspond with the same dates. Because CEUs used to obtain the Endorsement will have preceded the beginning of Interpreter A's four-year Michigan credential cycle, the CEUs used toward that Educational Endorsement cannot be used again in 2020 (the Division in this instance will, in 2020, only count CEUs earned for Endorsements irrespective of when earned during 2016.).*

*If Interpreter A does not apply for the Elementary Educational Endorsement until December 1, 2018, CEUs earned from December 1, 2014 to December 1, 2018 may be used. The Endorsement would immediately be added to Interpreter A's existing credentials and will require renewal on June 30, 2020 at the end of Interpreter A's four-year Michigan credential cycle. When Interpreter A renews their Michigan certification on June 30, 2020, all CEUs earned during Interpreter A's four-year Michigan credential cycle from July 1, 2016 to June 30, 2020 may be used.*

*Irrespective of the date that the initial Endorsement was granted, when Interpreter A reapplies to maintain the Elementary Educational Endorsement on June 30, 2020, Interpreter A must submit proof of 0.8 CEUs (8 hours) related to educational interpreting earned from July 1, 2016 to June 30, 2020 and must also continue to comply with annual renewal requirements for Michigan certification of any existing credentials.*

**Q: What do interpreters with the RID Ed:K-12 credential need to know?**

**A:** Michigan will not automatically certify interpreters who hold the RID Ed:K-12 Credential as qualified to work in educational settings because the Michigan Interpreter Rules still require independent verification of EIPA scores and Endorsement eligibility.

An EIPA score of 4.0 is one of the requirements for obtaining a RID Ed:K-12 credential, but the RID Ed:K-12 certification does not indicate whether the interpreter's EIPA was for elementary or secondary educational settings. Effective September 1, 2016, all educational interpreters with a valid EIPA Elementary Endorsement may work in either elementary or secondary educational settings. However, interpreters with a valid EIPA Secondary Endorsement cannot work in elementary educational settings.

Michigan will continue to recognize the RID Ed:K-12 credential, but because the RID Ed:K-12 credential alone does not provide the Division with this information, the interpreter will be required to present and list their EIPA credentials in order to continue working in elementary or secondary educational settings. Educational interpreters with a valid RID Ed:K-12 credential should have no difficulty independently establishing their credentials but they must do so by providing the information directly to the Division and not through a third party.

Michigan will accept active RID membership as proof that a K-12 interpreter is maintaining the CEUs needed for certification, but the interpreter is required to provide Michigan with proof of only 0.8 (8 hours) CEUs necessary to obtain the Educational Endorsement.

**Q: What should school districts do in order to ensure compliance with the Michigan Rules and Regulations?**

**A:** Michigan law requires that when a school district provides a sign language interpreter, the interpreter must be fully qualified as defined by the Rules. In short, this means school districts must hire and use only fully and properly certified interpreters. The Rules do provide limited exceptions for schools that, AFTER all reasonable efforts have been exhausted CANNOT locate a fully qualified interpreter.

In other words, a school district must do everything reasonable in their attempt to hire a fully qualified interpreter before it can consider doing anything less. It is impossible to provide an exact definition of "everything reasonably possible" but a school district will not meet this legal obligation if it did not begin its search process in a timely manner, does not offer a competitive salary, does not sufficiently advertise a position, or if it fails to contact both qualified interpreters and interpreter agencies whose contact information is listed on the Michigan Online Interpreter System. Therefore, school districts are encouraged to begin recruiting appropriately qualified educational interpreters as early as possible and to follow all of the steps outlined in Rule 27(3)

before requesting an exception from the Division or retaining anyone other than a fully qualified interpreter. Additional information on the Exception process will be included in a separate FAQ document.

**Q. As an educational interpreter, am I required to submit 8.0 CEUs (80 hours) during each four-year Michigan credential cycle, or is it 0.8 CEUs (8 hours)?**

**A:** Both. Effective July 7, 2016, all interpreters who have valid state-issued certifications are required to comply with the 8.0 CEU (80 hours) requirements of each four-year Michigan credential cycle as outlined in Rule 81. For educational interpreters, Rule 83 requires that at least 0.8 CEUs (8 hours) of the 8.0 CEUS (80 hours) must be in educational interpreting-related subjects.

**Q: As an interpreter qualified to work in Standard Level 2 or 3 settings, am I required to also apply for an Educational Endorsement in order to be qualified to work in Secondary settings?**

**A:** Yes. The Rules do provide that Standard Level 2 and 3 interpreters are considered qualified to work in certain educational settings and under specific circumstances, but ONLY if s/he also possess the CEUs required by Rule 83(2). The Rules do not provide any instances in which an interpreter (regardless of certification level) can interpret in educational settings without having obtained at least 0.8 CEUs (8 hours) of educational interpreting required for an educational endorsement.

Interpreting in an educational setting requires different skills than all other settings, and the Michigan Rules recognize this by separating the educational setting from the three other practice levels. Because it is critical to understand the unique requirements of educational interpreting, even in the limited circumstances where the Rules treat non-educational interpreters as qualified, it does so only for those with a minimal amount of educational interpreting training.

**Q: As an educational interpreter, if I work with students who are deafblind, am I required to obtain a DeafBlind Endorsement?**

**A:** Yes. Effective July 7, 2016, all educational interpreters who interpret for students that are deafblind must obtain a DeafBlind Endorsement.