



Iowa Guidelines for Educational Sign Language Interpreters and Transliterators

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Introduction

According to the Individuals with Disabilities Education Act (IDEA, 2004), all students with disabilities (from birth through 21) are afforded the right to a free and appropriate public education (FAPE). However, to access the general education curriculum, students with hearing loss may require the services of an educational interpreter or transliterator.

Purpose and Applicability of Document

The purpose of these guidelines is to provide general information for interpreters and about the use of interpreters in a pre-kindergarten through grade 12 (PK-12) school setting. Specifically, this document provides support to local school districts, interpreters,* parents, students who are deaf or hard of hearing, and other members of an educational team (e.g., individual educational plan [IEP] team, 504 team) in understanding interpreter qualifications, roles, responsibilities, and ethical conduct.

*Interpreters contracted with school districts from outside agencies are expected to adhere to the guidelines in this document.

Terms and Acronyms

There are many terms used to refer to people who are deaf and those who are hard of hearing. State and federal statutes may use "deaf" or "hard of hearing" to describe students eligible for special education services because of their hearing status. These terms may also reflect an individual's cultural or personal identity. Some individuals may prefer to identify themselves by one or more terms.

This document uses the following acronyms:

- DHH – Deaf or hard of hearing
- TDHH – Teacher of the deaf and hard of hearing
- ITP – Interpreter training program
- Interpreter – A person who provides interpretation services, which is the process of conveying information between American Sign Language (ASL) and English
- Transliterator – A person who conveys information from one mode (spoken or signed) of English to another mode of English

*From this point forward, the term "interpreter" will encompass both interpreters and transliterators.

Definition and Role of the Interpreter

Regardless of the job title, anyone facilitating communication between an individual who is DHH and an individual who is hearing is interpreting and must meet the state interpreter licensure requirements (see Appendix A: Licensure Requirements for Educational Interpreters in the State of Iowa). The interpreter facilitates communication and understanding between students who are DHH and a variety of persons who are hearing (e.g., students, teachers, school staff, any others involved in the student's education).

Definition

Iowa Administrative Code subrule 281–41.34(3), paragraph d defines "interpreting services" for children who are:

- Deaf or hard of hearing oral transliteration services as "cued language transliteration services, sign language transliteration and interpreting services, and transcription services, such as communication access real-time translation (CART), C-Print, and TypeWell" and
- Deaf-blind as "special interpreting services."

Interpreters use varied modes of communication, depending on the student's communication needs and educational team's decisions (e.g., decisions by the IEP team, 504 team). The type of interpreter that the school district provides to the student who is DHH depends on the student's communication needs. There are several different types of interpreters:

- Oral interpreters – Individuals who use lip movements to interpret.
- Cued speech transliterators – Individuals who use cued speech to interpret.
- Deaf-blind interpreters – Individuals who use tactile forms of ASL to interpret.
- Certified deaf interpreters – Individuals who use interlingual or intralingual sign language interpreting.
- Sign language interpreters – Individuals who use ASL or another signed system to interpret.

When students who are DHH use signed language to communicate expressively, the interpreter will interpret the signed language into spoken language.

Clarification of Interpreter's Role and Training

Clarification of the interpreter's role will prevent uncertainty regarding how they contribute to the educational process. The school district should provide in-service training on the interpreter's role to appropriate school personnel by the TDHH, audiologist, and/or interpreter. This training may assist staff in accepting the interpreter as part of the educational team and promote the integration of the interpreter into the school community. Information on the interpreter's role may be provided during staff meetings, one-on-one meetings, or with simple printed handouts explaining how best to utilize the service of an interpreter. It is important to emphasize that the interpreter is there for everyone, not just the individual who is DHH. This point may need to be reiterated periodically throughout the school year.

Responsibilities of the Interpreter

Interpreter responsibilities include (but are not limited to):

- Facilitating all communication in a variety of environments (e.g., announcements, discussions, assemblies) and fostering student independence;
- Participating as a member of the educational team (e.g., IEP team, 504 team);
- Collaborating with educational staff, including reporting concerns to the appropriate individual;
- Facilitating all communication in the student's out-of-class and extracurricular activities;
- Explaining the role of an interpreter (see the previous Clarification of Interpreter's Role and Training section);
- Abiding by and supporting educational document(s) and related recommendations; and
- Demonstrating an interest in self-improvement in interpreting by attending appropriate workshops, seminars, and staff development sessions when available (see Appendix A: Licensure Requirements for Educational Interpreters in the State of Iowa).

The school district should not ask the interpreter to assume duties that interfere with their primary role of interpreting. Examples of such duties include covering a classroom, teaching a lesson, managing classroom or student behavior, toileting, feeding, and providing other medical care to the student.

Facilitating Student Communication and Fostering Independence

Though the primary role of an interpreter is communication facilitation, younger students or those with delayed language may need additional direct interpreter support. The educational team should agree upon these supports. They may include explicit student training on the interpreter's role and the creation and use of additional visual supports for language development. Interpreters are expected to foster independence by reducing the level of extraneous support as students mature. At no time should the interpreter do things for the student that they can do for themselves.

Testing Situations

Federal and state regulations have placed increased emphasis on measurement, assessment, and validation of a student's performance. Measurements may include curriculum-based evaluation, district-wide testing, and other evaluation forms.

The student's educational team must determine the degree to which a student who is DHH will participate in assessments. The student's educational team must document participation in the district-wide assessment and determine whether any accommodations (such as interpreting) will be provided to the student. Please note that accommodations cannot:

- Change the content or structure of the test,
- Change what the test is intended to measure, and
- Change or enhance the student's response.

Interpretation is a valid accommodation for some students when taking assessments. However, individuals who provide this interpretation must follow all applicable laws and procedures. For example, when the student's IEP stipulates interpretation, it generally refers to the interpretation of directions, questions, and multiple-choice answers. Interpretation of reading passages usually is not permitted since the test's purpose is to assess the student's ability to comprehend text.

If all items are interpreted, the test administration will take longer than the prescribed time. Waiving time limits is typically a reasonable accommodation. If the student who is DHH will take longer than other students, or if the interpretation is likely to be distracting to other students, the test may be given in another room with the interpreter and a test proctor. The interpreter is not considered a test proctor.

Effective interpretation requires the interpreter to be familiar with the material being interpreted. For this reason, when possible, an interpreter may want to look over the assessment ahead of time.

Tutoring

The school district may ask the interpreter to tutor under the supervision of a certified teacher. Since interpreters must communicate well with the student, tutoring and reviewing assignments may be an appropriate job responsibility. However, it must be clear that these additional responsibilities will not take the place of interpreting. Interpreters are not certified teachers but should be familiar with the subject area they are tutoring. Training in appropriate instructional strategies may also be needed. If the interpreter is not providing tutoring under the direction of a teacher, the interpreter should be available to interpret tutoring sessions between the teacher and student to reinforce curriculum-based vocabulary.

Participating as an IEP Team Member

As the interpreter and provider of special education services for the student, the interpreter should be considered a part of the IEP team. The IEP team members must include all the following:

- a. The parents of the child;
- b. At least one regular education teacher of the child if the child is, or may be, participating in the regular education environment;
- c. At least one special education teacher of the child or, where appropriate, at least one special education provider of the child;
- d. A representative of the public agency who:
 - Is qualified to provide, or supervise the provision of, specially designed instruction to meet the unique needs of children with disabilities;
 - Is knowledgeable about the general education curriculum; and
 - Is knowledgeable about the availability of resources of the public agency.
- e. An individual who can interpret the instructional implications of evaluation results, who may be a member of the team described in 41.321(1) "b" to "f";
- f. At the discretion of the parent or the agency, other individuals who have knowledge or special expertise regarding the child, including related services personnel as appropriate; and
- g. Whenever appropriate, the child with a disability (Iowa Admin. Code r. 281—41.321).

The interpreter plays an essential role in the IEP team because they see the student throughout the school day in varied settings and have particular expertise into the student's language and communication needs. The interpreter is a related service provider and can provide critical information regarding the student's opportunities to communicate with peers, how they understand others, and their understanding of subject material. The IEP team must consider these communication needs during IEP development. This consideration includes evaluating the student's:

- Language and communication needs,
- Opportunities for direct communications with peers and professional personnel in the child's language and communication mode,
- Academic level, and
- Full range of needs, including opportunities for direct instruction in the child's language and communication mode (Iowa Admin. Code r. 281—41.324(1)"b"(4)).

If the interpreter cannot attend the IEP team meeting, they can submit written input regarding IEP development before the meeting. If an IEP team member needs interpreting services during IEP meetings, a different interpreter should be provided so that the student's interpreter can participate in the meeting without a role conflict.

Collaborating With Educational Staff: Preparation and Planning

The interpreter must regularly (perhaps daily) consult the student's teachers and other individuals involved in the student's educational program. This consultation could include reviewing lesson plans, upcoming activities, tests, new vocabulary, as well as the lesson's goals and objectives and special notations that affect the student's instruction on that particular day.

Access to Materials, Equipment, and Workspace

To effectively provide interpreting services that match the student's communication and cognitive abilities, the school district must provide the interpreter access to relevant student information and files regarding special instructional needs, instructional materials, equipment, and a workspace.

Instructional Materials

The interpreter will need access and preparation time to review all pertinent instructional materials to be interpreted (see the following Preparation Time section). Such materials include reviewing course and/or lecture outlines, class notes, required readings, tests, and quizzes, films, videotapes, and other media.

Equipment and Workspace

The interpreter should have the same conditions of employment as other personnel employed by the district. Interpreters should be provided with a workspace and access to technology appropriate to their position. Interpreters often use laptops or tablets with video recording capabilities for preparation, evaluation, and professional development. Laptops or tablets also provide the means to utilize additional visual aids and materials for students in the classroom.

Preparation Time

To effectively fulfill the primary role of providing interpretation in the educational setting, the school district should include preparation time in the interpreter's work schedule. Educational planning will improve the quality of interpreting. The educational team may also identify the need for the interpreter to instruct all students (including DHH and hearing) on how to best communicate with a peer who is DHH or work with an interpreter, which would also require planning time.

Breaks

In addition to scheduling planning time, before the school district assigns the interpreter's schedule, it should consider the number of hours the individual is interpreting each day and schedule appropriate breaks from interpreting. This scheduling of breaks is especially important given the mental processing demands of interpreting and that Cumulative Trauma Disorder (CTD) and Repetitive Motion Injury (RMI) are increasingly common occurrences among interpreters. These refer to various symptoms resulting from cumulative traumas associated with nerves, muscles, tendons, bones, or the neurovascular system. CTD and RMI result from exposure over time to one or more of the following:

- Repetitive performance of a physical task;
- A task done repeatedly with force, speed, or with extremities placed in awkward positions; and/or
- Inadequate recovery time and insufficient rest at appropriate intervals.

Interpreting continuously for an hour or longer results in mental and physical fatigue and reduces the quality and effectiveness of the interpreting process and the student's interpretation. The TDHH should be cognizant of this need in a lecture or classroom situation and provide at least a 10-minute break each hour. The student may complete deskwork or other activities that do not require the services of an interpreter.

Facilitating Communication for Out-of-Class and Extracurricular Activities

The interpreter's responsibilities may include interpreting during out-of-class and extracurricular activities. The district should distinguish these responsibilities from extra duties as assigned. Out-of-class activities are those in which the educational interpreter is primarily involved in interpreting for the student who is DHH and facilitating communication between the student outside the classroom. Examples of out-of-class activities may include lunch, recess, assemblies, field trips, meetings involving disciplinary issues, parent or IEP conferences, and meetings with school personnel. When possible, the interpreter's direct supervisor or building principal must notify the interpreter about out-of-class and extracurricular activities ahead of time.

Abiding by and Supporting Educational Document(s) and Related Recommendations: Professional Conduct

When an interpreter works in a public school, they are legally responsible for assisting in implementing the student's educational plan. The interpreter is bound by applicable laws (e.g., Health Insurance Portability and Accountability Act [HIPAA], Family Educational Rights and Privacy Act [FERPA], IDEA, Americans with Disabilities Act [ADA]) and expected to adhere to them.

National interpreter organizations have codes of professional conduct. The National Association of Interpreters in Education (NAIE) has a [code of ethics](#) for interpreters working in educational settings. Interpreters are expected to adhere to this code when working with students who are DHH in K-12 settings. The Registry of Interpreters for the Deaf (RID) has a [code of professional conduct](#) to which interpreters are expected to adhere when working with adults who are DHH, whether they are in a school setting or not. When there is a conflict between state or federal law and interpreter codes of ethics, interpreters are expected to follow the law.

Whether an interpreter is employed by the school district or contracted from an outside agency to work in a school, they are expected to know and draw from these laws and codes in professional decision-making.

Questions and Additional Guidance

If you have questions, please contact Tori Carsrud at tori.carsrud@iowa.gov. For additional guidance and information, please visit the Department's [Deaf and Hard of Hearing Education webpage](#).

Appendix A: Licensure Requirements for Educational Interpreters in the State of Iowa

Interpreter Licensure

Every person providing sign language interpreting or transliterating services in Iowa must be licensed by examination or a temporary license. According to Iowa Administrative Code subrule 281—41.34(3), paragraph d, "interpreting services" includes the following:

- (1) For children who are deaf or hard of hearing oral transliteration services, cued language transliteration services, sign language transliteration and interpreting services, and transcription services, such as communication access real-time translation (CART), C-Print, and TypeWell; and
- (2) For children who are deaf-blind, special interpreting services.

Information regarding laws and rules can be found on the Iowa Department of Public Health's Bureau of Professional Licensure website for the [Iowa Board of Sign Language Interpreters and Transliterators](#).

Licensure by Examination Verification

Any sign language interpreter who takes the Educational Interpreter Performance Assessment (EIPA) and scores 3.5 or higher or obtains the national interpreter certification (NIC) through the Registry of Interpreters for the Deaf (RID) qualifies for "licensure by examination" in Iowa. An interpreter may also qualify to be licensed by examination by passing one of the exams listed in [Iowa Administrative Code chapter 361](#). Interpreters may also be licensed by examination in Iowa if they provide proof of interpreter licensure in another state, even if their license by examination in that state is not included in the exam list in chapter 361. The application and requirements can be found on the [Iowa Board of Sign Language Interpreters and Transliterators](#) website.

It is the responsibility of each interpreter to know the licensing requirements and subsequent updates to the requirements.

To verify an interpreter's license standing, visit the [Public License Search](#).

Temporary License

An applicant issued a temporary license is subject to the same requirements as a licensed interpreter or transliterator, which includes fulfilling all continuing education unit (CEU) requirements. A permanent license holder will mentor the temporary license holder. A temporary license is good for two years from the issue date. The holder can renew one time for a total of four years, provided the renewal is requested for the two years immediately following the initial license period. One will be eligible to apply for a permanent license by achieving a 3.5 on the EIPA or passing another qualifying examination.

Interpreting With an Inactive License

An individual whose license is inactive continues to hold the privilege of licensure in Iowa but cannot practice as an interpreter in Iowa until the license is reactivated. A licensee who practices as an interpreter in the state with an inactive license may be subject to disciplinary action by the board, injunctive action pursuant to Iowa Code section 147.83, criminal sanctions pursuant to Iowa Code section 147.86, and other available legal remedies (Iowa Admin. Code r. 645—363).

Continuing Education and Renewal

Before license renewal every two years, the interpreter must complete 40 hours of continuing education. Temporary license holders will be required to obtain 40 hours of CEUs and work with a mentor. Temporary license holders will have two years from their issue date, and permanent license holders will renew on June 30 of every odd-numbered year. Guidelines for these continuing education hours are detailed on the [Iowa Board of Sign Language Interpreters and Transliterators website](#).

Substitute Interpreter Information

Any person who interprets or transliterates in Iowa must have an active license. However, there is an exception for substitute interpreters in school settings in Iowa Code section 154E.4, paragraph d. Any person working as a substitute for a licensed interpreter in an early childhood, elementary, or secondary education setting may work without an active Iowa license for up to 30 school days in a calendar year. A day is defined as any portion of the day (whether 10 minutes or 10 hours) spent in the school providing interpretation or transliterating services to a student.

Appendix B: Sample Interpreter Job Description

The purpose of Appendix B is to provide a sample interpreter job description.

Basic Function

Interpret between spoken English and American Sign Language (ASL; or another signed or visual system) at a fluent rate. Only the essential functions and primary responsibilities are listed below; specific position requirements will vary depending on the needs of the student services department.

Essential Functions

1. Interpreting any and all information presented in a classroom or building situation (e.g., lectures, announcements, discussions, assemblies);
2. Attending staff and individualized education plan (IEP) meetings (when appropriate);
3. Participating as part of the IEP instructional team and working collaboratively with other team members;
4. Interpreting as delineated by the student's IEP, using the district's communication policy as a guide;
5. Providing access to the student's school day, which may include testing time, clubs, or independent work;
6. Interpreting for school-sponsored functions outside of the classroom during regularly scheduled school hours (not required to interpret at non-school sponsored events);
7. Maintaining confidentiality;
8. Seeking professional development opportunities and attending district-sponsored professional development opportunities (as appropriate);
9. Serving as liaison to promote rapport between general education and deaf education classrooms, students, the school, and deaf community; and
10. Maintaining satisfactory and harmonious working relationships with the public, students, and other employees.

Primary Responsibilities

1. Conferring and planning with the educational team to prepare for interpreting;
2. Assisting with classroom modifications when appropriate, as determined by the IEP, educational team, or in consultation with other direct service personnel;
3. Providing sign language instruction in mainstream classes (if requested);
4. Interpreting for deaf adults (when appropriate); and
5. Other duties as assigned (e.g., tutoring, facilitating student independence).

Hiring Specifications

Required Specification

Must be licensed by the Iowa Department of Public Health.

Preferred Specifications

- Two-year (or more) interpreter training program and/or experience involving extensive contact with the deaf and hard-of-hearing community
- Associate of arts or bachelor of arts degree