

Maine Association of the Deaf

Position Statement on LD 2087 / HP 1402

An Act to Amend the Laws Governing the Licensure of American Sign Language Interpreters

Date: January 28, 2026

Re: Legislative Document 2087, House Paper 1402

Executive Summary

The Maine Association of the Deaf (MeAD) recognizes LD 2087 as a beginning step toward transforming interpreter licensure in Maine following the October 2023 Lewiston tragedy. While we appreciate the emergency exemption provision and the extension of conditional licensure from 4 to 5 years (with a 6th year in cases of extreme hardship), **we cannot fully support this legislation without critical amendments** that would create genuine pathways to professionalization for interpreting students and experienced practitioners.

What We Support

MeAD supports the following provisions in LD 2087:

1. **Emergency Exemption Provision** (Section 3, creating 32 MRSA §1525-A, sub-§3): The authorization for emergency communication assistance during crises addresses the immediate access gaps highlighted during the Lewiston shooting response.
2. **Extended Conditional Licensure Period:** Extending the conditional license from 4 to 5 years, with a 6th year for extreme hardship, recognizes the practical challenges interpreters face in obtaining national certification.
3. **Broadened Educational Pathways** (Section 2): The amendment allowing “an associate degree or higher in **any field**” (rather than only ASL-specific degrees) creates important flexibility and recognizes that interpreting skills can be developed by individuals with diverse educational backgrounds. This change removes an unnecessary barrier while maintaining quality through required ASL proficiency testing and the RID Knowledge Exam.

Critical Gaps in the Legislation

Gap #1: No Recognition of Equivalent Educational Progress

The Problem: Current statute 32 MRSA §1524-C, sub-§3(A)(1) requires completion of “an associate degree or higher” for conditional licensure eligibility. LD 2087 maintains this requirement unchanged for those without a degree.

The Impact: Junior and senior students in bachelor's degree programs—particularly those enrolled in USM's CCIE-accredited ASL/English Interpreting Program (<https://usm.maine.edu/departments-linguistics/accreditation-interpreter-training-program/>)—have typically completed 60+ credits equivalent to an associate degree but **cannot obtain conditional licensure** until they complete their full 4-year degree.

Why This Matters: - USM interpreting students complete the RID Knowledge Exam **before** entering practicum in their junior year - These students have demonstrated ASL proficiency at ASLPI 3.0 or higher—the same standard as conditional licensure - They need supervised practice hours to develop skills, but cannot legally interpret while completing their degrees - Upon graduation, they enter the workforce **without** the 2+ years of practical experience that conditional licensure during their studies would provide

Recommended Amendment:

32 MRSA §1524-C, sub-§3(A) should be amended to read:

A. At least one of the following:

(1) An associate degree or higher in any field, including an associate degree or higher in American Sign Language, American Sign Language interpreting or deaf studies, from an accredited college or university;

(1-A) Completion of at least 60 credit hours toward a bachelor's degree in any field, including American Sign Language, American Sign Language interpreting, deaf studies, or linguistics with an interpreting concentration, from an accredited college or university, with documented enrollment in good standing in such a program; or

(2) For persons holding a limited license that is current on the effective date of this section, or for any person seeking initial conditional licensure, successful completion of an alternative pathway approved by the Registry of Interpreters for the Deaf, Inc., as documented by official verification from RID.

Note: This amendment incorporates LD 2087's proposed change in Section 2 (broadening from ASL-specific degrees to "any field") while adding the 60-credit-hour pathway and opening the Alternative Pathway to all applicants.

Gap #2: RID Alternative Pathway Not Recognized for New Conditional Licensure Applicants

The Problem: Current statute 32 MRSA §1524-C, sub-§3(A)(2) limits the RID Alternative Pathway only to "persons holding a limited license that is current on the effective date of this section" (i.e., October 18, 2021). This is a grandfathered provision that will eventually phase out entirely. LD 2087 **does not address this limitation**.

What is RID's Alternative Pathway? The Registry of Interpreters for the Deaf (RID) Alternative Pathway Program

(<https://rid.org/certification/alternative-pathway-program/>) uses an Educational Equivalency Application (EEA) with a credit point system that awards Experience Credits

for: - College coursework (semester or quarter hours from accredited institutions) - Professional interpreting experience (both single employer and freelance/multiple employer work) - Professional development and continuing education

Each Experience Credit is roughly equal to one semester hour of college credit. Applicants need 60 Experience Credits for an associate's degree equivalency or 120 Experience Credits for a bachelor's degree equivalency. Notably, **someone who has interpreted on a full-time basis for 4 years meets the educational equivalency of an associate degree** for RID's educational requirement.

This pathway was specifically designed for interpreters in rural areas, career changers, CODAs with native fluency, and those who gained expertise through experience rather than formal degrees—precisely the population Maine needs to support.

The Impact: - Experienced interpreters with substantial training and work history **cannot** pursue conditional licensure without returning to school for an AA or BA degree - Rural interpreters who completed intensive training programs but lack formal degrees are excluded - The Alternative Pathway is recognized by multiple other states (including New Mexico:

<https://www.rld.nm.gov/boards-and-commissions/individual-boards-and-commissions/signed-language-interpreting-practices/>) but Maine treats it as second-class - RID and CASLI explicitly recognize this pathway as equivalent to degree requirements (<https://www.casli.org/getting-started/more-about-rid-certification/>)

Who This Affects: According to the Transforming Interpreting Maine (TIME) needs assessment, Maine faces a critical interpreter shortage, particularly in rural areas. The Alternative Pathway would create licensure access for: - Experienced interpreters who trained before formalized ITP programs existed - CODAs (Children of Deaf Adults) with native fluency but non-traditional educational paths - Career changers with substantial credits but not a complete degree - Interpreters in Washington, Aroostook, and other rural counties with limited access to degree programs

Recommended Amendment:

32 MRSA §1524-C, sub-§3(A)(2) should be amended to read:

(2) For persons holding a limited license that is current on the effective date of this section, or for any person seeking initial conditional licensure, successful completion of an alternative pathway approved by the Registry of Interpreters for the Deaf, Inc., as documented by official verification from RID.

Note: This removes the grandfathering limitation and makes RID's Alternative Pathway available to all conditional licensure applicants, not just those who held limited licenses before October 18, 2021.

Alignment with National Standards and Peer States

Our recommended amendments align Maine with:

1. **RID/CASLI National Certification Standards:** Both recognize the Alternative Pathway as equivalent to degree requirements for NIC certification eligibility
2. **Multiple State Models:** According to the TIME needs assessment, **Missouri, Louisiana, Tennessee, and North Carolina** all recognize alternative pathways to interpreter licensure. These states demonstrate that alternative pathways can maintain quality standards while removing unnecessary barriers:
 - **Missouri:** Missouri Interpreters Certification System (MICS) has educational requirements that recognize multiple pathways (<https://mcdhh.mo.gov/interpreter-info/>)
 - **Louisiana:** Accepts multiple pathways, including RID certification, BEI certification, and various assessment levels for both provisional and qualified licensure (<https://ldh.la.gov/assets/docs/deafcommission/FAQsEducationalInterpreters.pdf>)
 - **Tennessee:** Provides pathways for educational interpreters through nationally recognized certifications and alternative assessments (<https://www.tn.gov/education/educators/licensing/educator-licensure/new-to-education.html>)
 - **North Carolina:** North Carolina Interpreters and Translators Licensing Board approved “Additional Pathways to Licensure” effective February 1, 2025, including recognition of credentials from other states (<https://ncitlb.org/requirements-for-licensure/>)
 - **New Mexico:** Signed Language Interpreting Practices Board explicitly accepts RID’s Alternative Pathway for licensure (<https://www.rld.nm.gov/boards-and-commissions/individual-boards-and-commissions/signed-language-interpreting-practices/>)
3. **CCIE-Accredited Program Outcomes:** USM’s interpreter training program is accredited by the Commission on Collegiate Interpreter Education (CCIE), which establishes that graduates meet entry-level competencies **before** degree completion

Maine is behind peer states: While Missouri, Louisiana, Tennessee, North Carolina, and New Mexico have created flexible pathways that maintain quality standards, Maine’s current statute restricts the Alternative Pathway only to grandfathered limited license holders. This puts Maine at a competitive disadvantage in attracting and developing interpreters.

Supporting Maine’s Interpreter Workforce Development

The Transforming Interpreting Maine (TIME) needs assessment specifically recommends increasing “professional development opportunities, like **mentorships, apprenticeships, or specializations**” (emphasis added). The amendments we propose directly support these workforce development goals:

How These Amendments Enable Apprenticeship Programs

Current Barrier: Maine cannot effectively implement interpreter apprenticeship programs when:

- Students with 60+ credits toward BA degrees cannot work as conditional licensees
- Experienced interpreters without formal degrees cannot obtain conditional licensure through RID's Alternative Pathway

With Our Proposed Amendments: 1. **Student Apprenticeships:** Junior/senior USM students could work under conditional licenses while completing their degrees, gaining 1-2 years of supervised experience that would make them certification-ready upon graduation

2. **Experience-Based Apprenticeships:** Interpreters who complete RID's Alternative Pathway could enter conditional licensure and participate in structured mentorship programs to develop specialized skills
3. **Rural Interpreter Development:** Rural areas without access to formal ITP programs could develop apprenticeship pathways combining the Alternative Pathway with local mentorship

TIME Project Alignment

The TIME project website (<https://www.maine.gov/dhhs/TIME>) states goals to: - "Increase enrollment in interpreter training programs (ITPs) and offer more professional development opportunities, like mentorships, apprenticeships, or specializations" - "Review licensure and certification rules for both hearing and Deaf ASL interpreters to keep high standards while **removing unnecessary barriers**" (emphasis added)

Our proposed amendments **remove unnecessary barriers** while maintaining quality standards through: - Required ASL proficiency testing (ASLPI 3) - Required passage of RID Knowledge Exam - Supervised conditional licensure period - Clear pathway to national certification

Without these amendments, Maine's ability to implement the apprenticeship and mentorship programs recommended by TIME remains severely limited.

The summary of LD 2087 states it "addresses certain recommendations from the Transforming Interpreting Maine (TIME) needs assessment report issued by the Department of Health and Human Services in 2024 in the wake of the October 2023 Lewiston shooting."

True transformation requires: - **Creating pathways**, not just relaxing timelines - **Recognizing lived experience and alternative education**, not just traditional degrees - **Supporting students to become professionals**, not forcing them to wait until after graduation to begin meaningful practice - **Equity for rural and non-traditional interpreters**, not perpetuating barriers

MeAD's Position

We recognize LD 2087 as a significant step forward through the emergency exemption, an extended conditional licensure period, and broadened educational pathways in Section 2 (allowing degrees “in any field”). However, **we cannot fully endorse this legislation without critical amendments** that would create genuine pathways to professionalization for interpreting students and experienced practitioners.

We urge the Committee on Health Coverage, Insurance and Financial Services to:

1. **Amend 32 MRSA §1524-C, sub-§3(A) to add subsection (1-A) creating conditional licensure eligibility for students who have completed at least 60 credits toward a bachelor's degree in any field** (Gap #1 above). This builds on LD 2087's Section 2 change (allowing degrees in “any field”) by extending that same flexibility to students still completing their degrees.
2. **Amend 32 MRSA §1524-C, sub-§3(A)(2) to remove the grandfathering limitation and make RID's Alternative Pathway available to all conditional licensure applicants** (Gap #2 above). This aligns with peer states identified in TIME (Missouri, Louisiana, Tennessee, North Carolina) and with RID's national standards.

Without these amendments, Maine perpetuates barriers that: - Prevent interpreting students from gaining essential supervised practice during their training - Exclude experienced interpreters with non-traditional educational backgrounds - Contradict national standards set by RID and CCIE - Undermine the stated goal of “transforming” interpreter licensure

The Deaf community deserves qualified, experienced interpreters. The current system—even with LD 2087's modest improvements—continues to restrict the very pathways that would build Maine's interpreter workforce.

Contacts

Maine Association of the Deaf

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For questions regarding this position statement:

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Related Resources: - Transforming Interpreting Maine (TIME) Project:
<https://www.maine.gov/dhhs/TIME> - RID Alternative Pathway Program:
<https://rid.org/certification/alternative-pathway-program/> - RID General Certification Information: <https://rid.org/certification/> - CASLI (Center for Assessment of Sign

Language Interpreters):

<https://www.casli.org/getting-started/more-about-rid-certification/> - USM ASL/English Interpreting Program:

<https://usm.maine.edu/departments/linguistics/accreditation-interpreter-training-program/> - Current Maine Law (32 MRSA §1524-C):

<https://legislature.maine.gov/statutes/32/title32sec1524-C.html> - New Mexico's Recognition of Alternative Pathway:

<https://www.rld.nm.gov/boards-and-commissions/individual-boards-and-commissions/signed-language-interpreting-practices/licensing-registration-and-renewal/signed-language-interpreting-practices/licensing-requirements/>