Understanding the Arizona American Sign Language Interpreter Shortage: ACDHH Needs Report

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May, 2024

Acknowledgements

The Arizona Commission for the Deaf and the Hard of Hearing would like to acknowledge the following people and organizations for their assistance with this study:

Alaina Kwan, Arizona's Family KPHO/KTVK
Amanda Wittman
Amerigo Berdeski
Arizona Department of Education
Erika Peery, Community Outreach Program for the Deaf
Holly Nelson, University of Arizona Deaf Studies Program
Jaclyn Schodt
Kirsten Nelson
Jazmyne Lemar, Louisiana Commission for the Deaf
Michelle Monahan, Phoenix College Interpreter Preparation Program
Victoria Bond

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Glossary

Certified Deaf Interpreter (CDI) - CDIs are individuals with hearing loss who are trained and credentialed to work as professional interpreters. CDIs often work with clients who use atypical language or in high-risk settings.

Deaf - For the purposes of this paper, all groups that utilize ASL interpreting services, including those who are culturally Deaf, hard of hearing, DeafBlind, and speech-impaired, are referred to as “deaf”.

On-Demand VRI - A type of interpreting service delivered remotely through video conferencing technology where services are available without pre-scheduling an appointment. *Ex: A hospital can press a button on a certain device and an interpreter appears on the screen.*

Qualified - An interpreter who holds the necessary credentials to work in a particular setting. In Arizona, interpreters working outside of the K-12 setting must have the appropriate Arizona license for the setting in which they are providing services. K-12 interpreters’ credentials are determined by individual school districts.

Scheduled VRI - A type of pre-scheduled interpreting assignment where services are delivered remotely through video conferencing technology. *(ex: Zoom meetings)*

Video Remote Interpreting (VRI) - An interpreted interaction where the interpreter is in a remote location connected to the consumers via video conferencing technology. It is possible for the consumers to be in-person with the interpreter joining remotely *(ex: a hospital emergency room)* or all consumers and the interpreter are joining remotely *(ex: Zoom meetings)*. The VRI interpreter’s services are paid for by the business or organization, not the deaf consumer.

Video Relay Service (VRS) - A service provided by the federal government to interpret phone calls between people who use sign language and people who do not. VRS calls are not intended to replace on-site interpreters; this service can only be used when the callers are in separate locations. Funding for VRS comes from the federal government.

Introduction

At the November 16, 2023 Board Meeting for the Arizona Commission for the Deaf and the Hard of Hearing (ACDHH), Commissioners Andrew Cohen, Sarah Benton, Virginia Thompson, and Jennifer Scarboro raised concerns about the shortage of qualified ASL interpreters in Arizona.[1] They requested investigation into:

- Reasons for the shortage
- Statistics on unfilled ASL interpreting requests
- Rate of ASL interpreter-initiated cancellations
- Comparison between unfilled in-person and virtual ASL interpreting requests
- Data on requests for Certified Deaf Interpreters (CDIs)
- Number of vacant ASL interpreting positions statewide

Interpreter shortages have been a longstanding challenge. In the 1960s-70s, the ASL interpreting field rapidly professionalized due to increased demand from federal legislation. However, this growth occurred without a solid foundational framework.[2] In response, the Registry of Interpreters for the Deaf (RID), the leading professional organization, declared a "National Interpreter Crisis" in 1994.[3] Subsequent nationwide surveys conducted by RID, the National Consortium of Interpreting Education Centers (NCIEC), and the National Interpreter Education Center (NIEC) in 2007, 2009, 2012, and 2014 also addressed this shortage.[4]

The ASL interpreter shortage has been in the spotlight recently, as well. In 2021, market research firm Nimdzi conducted an analysis of the ASL interpreting field, emphasizing the shortage.[5] Multiple states, such as Washington, Minnesota, Connecticut, Hawai'i, and Louisiana have either completed or are in the process of conducting wide-scale studies on ASL interpreter shortages, with some passing legislation to fund these efforts.[6] Over the past nine years, the shortage has been covered in more than 36 news articles across 19 states and 4 foreign

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[1] ACDHH Board Meeting 11/16/23
[2] Humphrey (2015)
[3] Swartz (2008)
[4] NIEC Report on Referral Agencies Needs Assessment (2013); NIEC Report on the National Needs Assessment Initiative (2016); NCIEC Interpreter Practitioner Needs Assessment Trends Analysis Report (2010)
[5] Nimdzi (2021)
[6] WA HB 2221 (2024); "Interpreting Forward 2030" (2024); Connecticut Statewide Needs Assessment Report (2023); SB3290 SD2 HD1 CD1 (2024); Interpreter Needs Assessment Report for the Louisiana Commission for the Deaf (2023)

countries *(see Appendix A)*, including a story on AZ Family in April 2024 that referenced this study.[7]

This report aims to address the inquiries raised by the ACDHH Commissioners while offering an overview of the current state of the ASL interpreting field in Arizona. In addition to presenting statistical data gathered from surveys and interviews, the report will include comparative data from past studies and personal comments from survey respondents.

[7] "Arizona is dealing with a sign language interpreter shortage" (2024)

Methodology & Demographics

ACDHH designed interviews and surveys to gather insights from five key stakeholder groups about ASL interpreting services. These groups are:

1. Interpreter Education Programs (IEP)
2. ASL Referral Agencies
3. Spoken Language Referral Agencies
4. Businesses and Organizations that Request Interpreting Services (Hiring Entities)
5. ASL Interpreters

Surveys were distributed to these stakeholder groups between December 2023 and April 2024 *(for a complete list of questions in each survey, see Appendices B-I).* Figure 1 outlines the response rate for each of the targeted stakeholder groups.

Interpreter Education Programs

Two of Arizona's post-secondary Interpreter Education Programs (IEP) were invited to join the study. One offers a Bachelor's program specializing in K-12 educational interpreting,

Survey & Interview Completion Rates

	Number of Surveys/ Interviews Offered	Number of Surveys/ Interviews Completed	Percentage Completed
Interpreter Education Programs	2	2	100%
ASL Referral Agencies	13	6	46%
Spoken Language Referral Agencies	19	10	52.6%
Hiring Entities	71	41	57.7%
ASL Interpreters	shared publicly	325	N/A

Figure 1: Survey and interview completion rates from each stakeholder group

while the other provides an Associates degree, training interpreters for various settings. Another institution offering interpreter preparation was omitted to prevent any conflict of interest, as the department chair of that program holds a position on ACDHH's Board. Interviews with both IEP representatives were conducted via Zoom. Further details on the IEP responses are provided in the Causes and Solutions sections of this report.

Interpreter Referral Agencies

Interpreter Referral Agencies coordinate ASL interpreting services. In 2021, the estimated market for ASL interpreting services in the United States was $1.2 billion.[8] Traditionally, ASL Referral Agencies and Spoken Language Referral Agencies operated independently. However, advancements in virtual interpreting technologies over the past two decades have led to a significant increase in Spoken Language Referral Agencies offering ASL interpreting services. For this study, data for these agencies will be kept separate to facilitate comparison.

ASL Referral Agencies specialize in the coordination of ASL interpreting services. Many owners and schedulers at these organizations are ASL interpreters or deaf consumers themselves, who have a deep connection to the local deaf community and a strong understanding of interpreters' needs. As a result, these smaller, “mom and pop” businesses play a significant role in providing the majority of ASL interpreting services nationwide.[9]

Most Arizona-based ASL Referral Agencies offered detailed insights through phone interviews. Two additional ASL Referral Agencies from outside of Arizona participated, although one was limited in the number of questions it could answer.

Spoken Language Referral Agencies primarily focus on spoken language interpreting and translation. While some companies are local, most Spoken Language Referral Agencies are large national or multinational corporations. Much of their interpreting service delivery is via Video Remote Interpreting (VRI). Additionally, there has been an increase in recruitment agencies securing contracts to source ASL interpreters. For this study, any business recruiting, hiring, or coordinating ASL interpreters whose business model is not focused on serving the deaf community is considered a Spoken Language Referral Agency.

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[8] Nimdzi (2021)
[9] Nimdzi (2021)

Contact information for Spoken Language Referral Agencies was gathered through various channels. Some were shared by Hiring Entities previously partnered with ACDHH. Others were familiar to the Commission from prior interactions. A Google search for "ASL interpreting in Arizona" led to the discovery of other agencies. However, a significant portion of the contacts came from the frequent "cold call" emails interpreters receive from these companies seeking to recruit ASL interpreters.

Only a small number of the contacted Spoken Language Referral Agencies had dedicated departments for ASL interpreting, making it difficult to find staff members with the knowledge to answer our questions. Although the majority of participating agencies completed the anonymous survey, two companies preferred answering what questions they could over the phone.

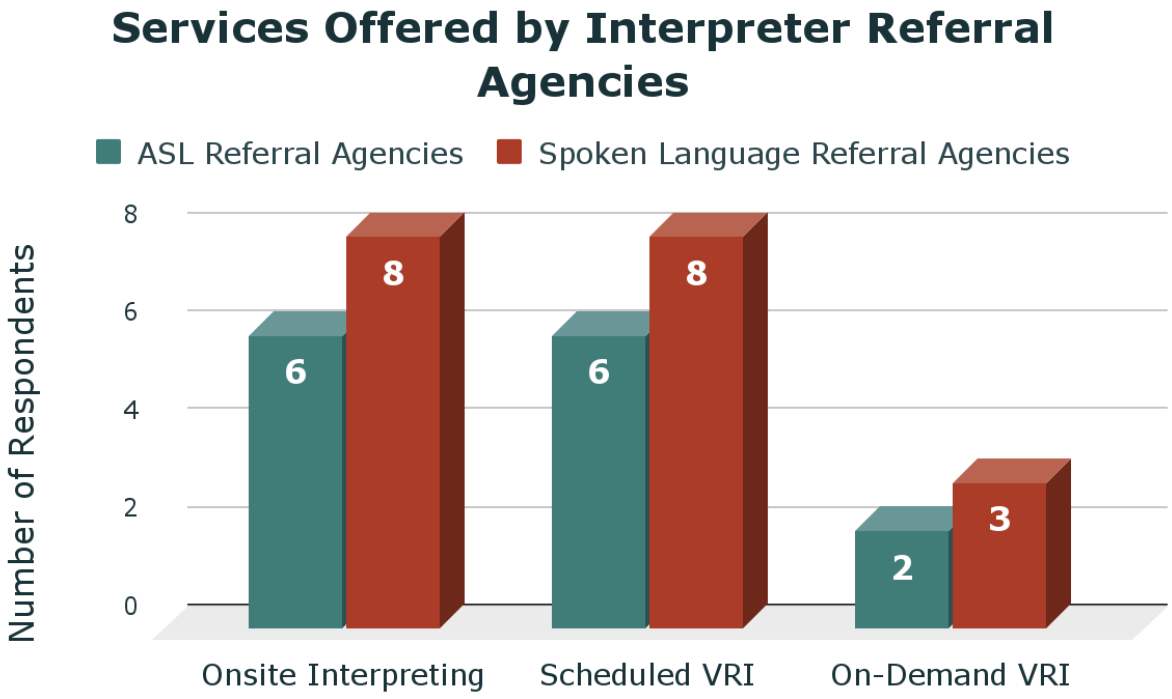

Figure 2: Services Offered by Interpreter Referral Agencies

Number of Arizona-Licensed Interpreters on Roster	
ASL Referral Agencies	**Spoken Language Referral Agencies**
10	3
108	4
104	1
400+	N/A
TOTAL: 622+	**TOTAL: 8**

Figure 3: Number of Arizona-Licensed Interpreters on Referral Agencies' Rosters

Referral Agencies were asked whether they offer onsite interpreting, scheduled VRI, or on-demand VRI *(Figure 2)*.The anonymous survey completed by Spoken Language Referral Agencies did not clarify if those services were offered in Arizona, specifically, or if some services were offered in other states. Because the ASL Referral Agencies were primarily interviewed, results for the ASL Referral Agencies are confirmed to be offered in Arizona.

Interpreter Referral Agencies were also asked to report the number of interpreters on their roster *(Figure 3)*. When asked about the licensure status of those employees *(Figure 4)*, several of the Spoken Language Referral Agencies were not familiar with the credentials used in Arizona. They reported working with 10-20 interpreters across various license categories, despite previously stating that they only collaborate with one or two ASL interpreters in total. To ensure data clarity, the conflicting reports from the Spoken Language Referral Agencies have been omitted. Two Spoken Language Referral Agencies responded "unsure" for each licensure category.

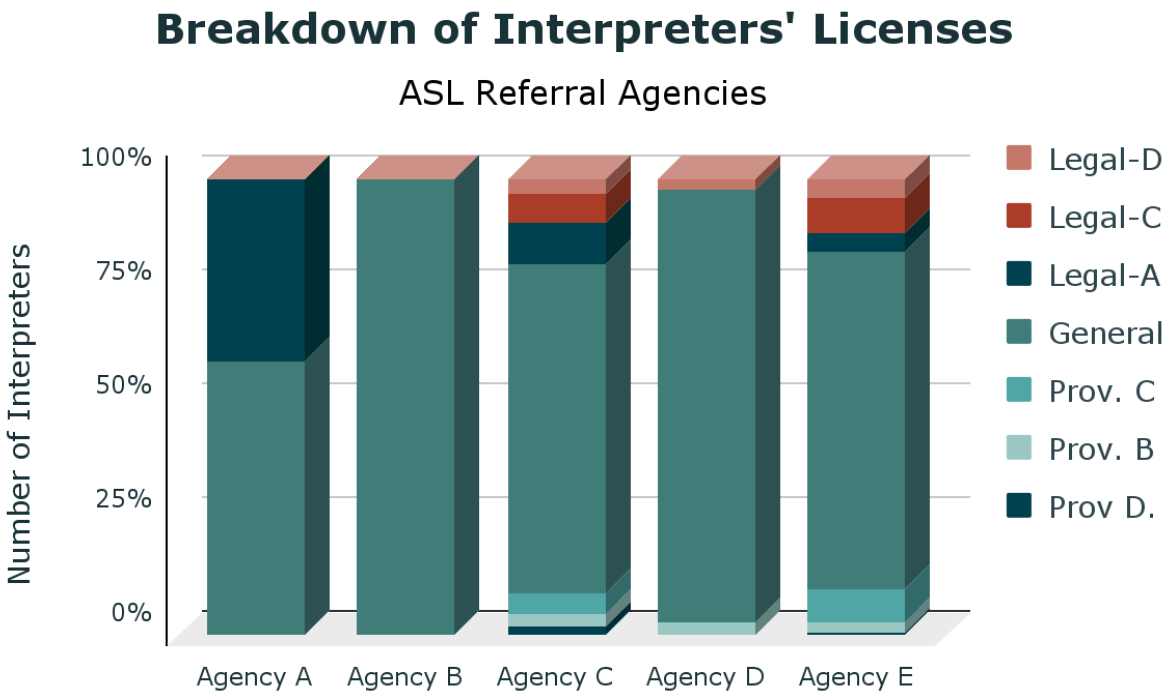

Figure 4: Breakdown of Interpreters' Licenses: ASL Referral Agencies

The survey delved into the geographical reach of each Interpreter Referral Agency *(Figure 5)*, recognizing that service availability tends to be more concentrated in urban areas. While the majority of agencies reported statewide coverage, some noted limitations to specific regions.

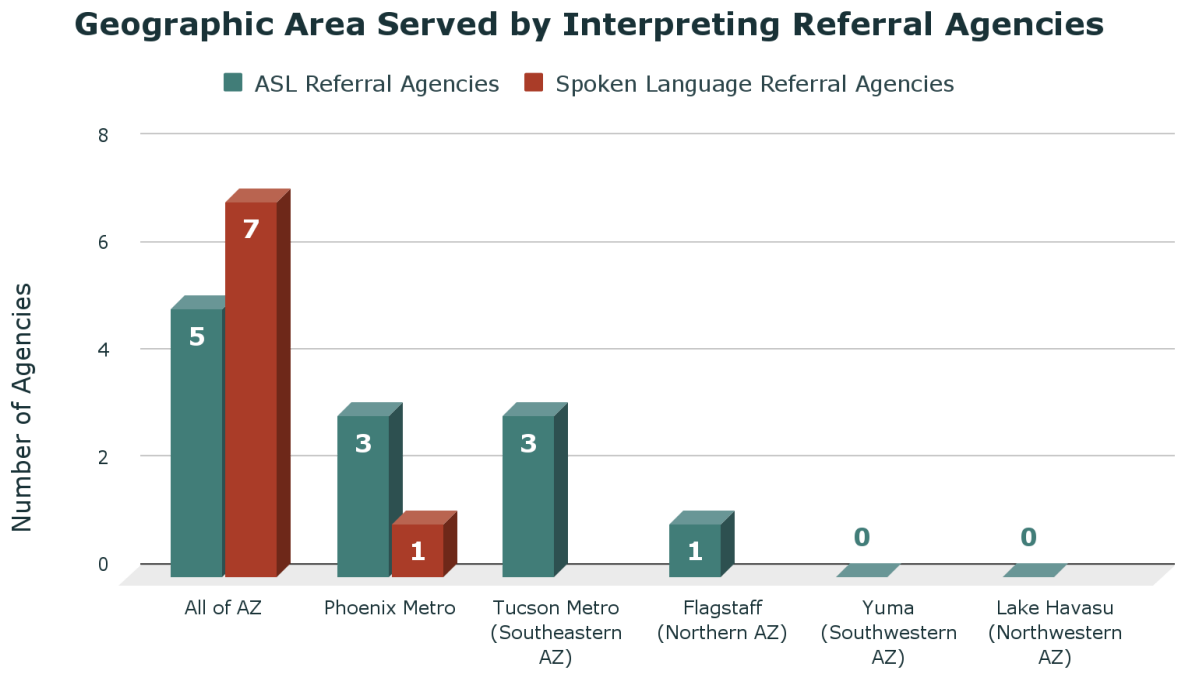

Figure 5: Geographic Area Served by Interpreter Referral Agencies

Survey questions were asked about the Referral Agencies' terms and conditions when working with ASL interpreters *(Figures 6 & 7)*. Cancellation policy refers to the deadline in which a Hiring Entity can cancel an interpreters' services without incurring fees. If the Hiring Entity cancels within that time frame, the Referral Agency (and, subsequently, the interpreter) are paid in full.

Referral Agencies' Travel Reimbursement Policies	ASL Referral Agency	Spoken Language Referral Agency
Pay for all travel time, portal-to-portal	0	2
Pay hourly rate for travel time if over 30 miles away	3	0
Pay hourly rate for travel time and reimburse mileage, federal rate	1	0
Reimburse mileage or pay for travel time, but not both	0	1
Reimburse mileage, federal rate	0	0
Flat rate stipend for travel	0	1
Varies, dependant on Hiring Entity approval	2	1
Follows state contract	1	0

Figure 6: Referral Agencies' Travel Reimbursement Policies

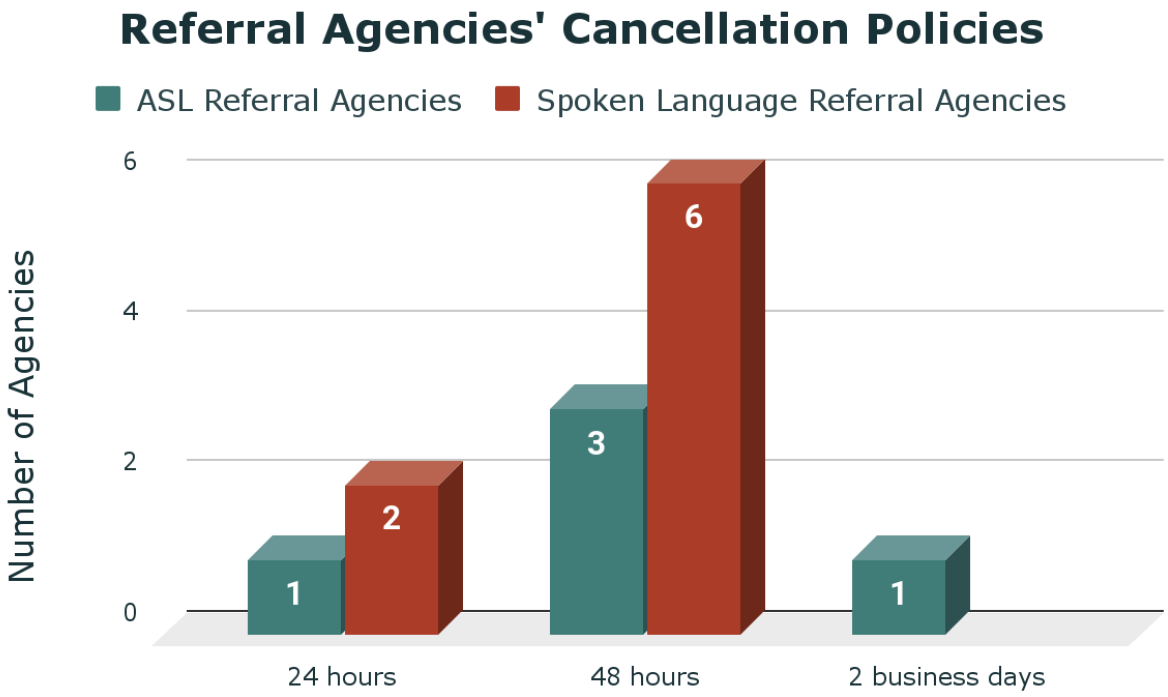

Figure 7: Referral Agencies' Cancellation Policies

The survey also inquired about the approximate number of requesters—individuals, organizations, or businesses that contracted with the agency for ASL interpreting services—within the past 12 months *(Figures 8 & 9)*. The purpose of this question was to gain insight into the areas where requesters concentrate their efforts when seeking ASL interpreting services. While the reported figures from Spoken Language Referral Agencies may appear modest, it's plausible that larger agencies with substantial contracts did not participate in the survey. Nimdzi reports that Sorenson Community Interpreting and LanguageLine Solutions dominate the ASL Video Remote Interpreting market, with ASL interpreting services being one of LanguageLine Solutions' largest divisions, second only to Spanish.[10] Community partners confirm that both companies offer VRI interpreting services in Arizona. Both organizations were asked to participate in this study.

[10] Nimdzi (2021)

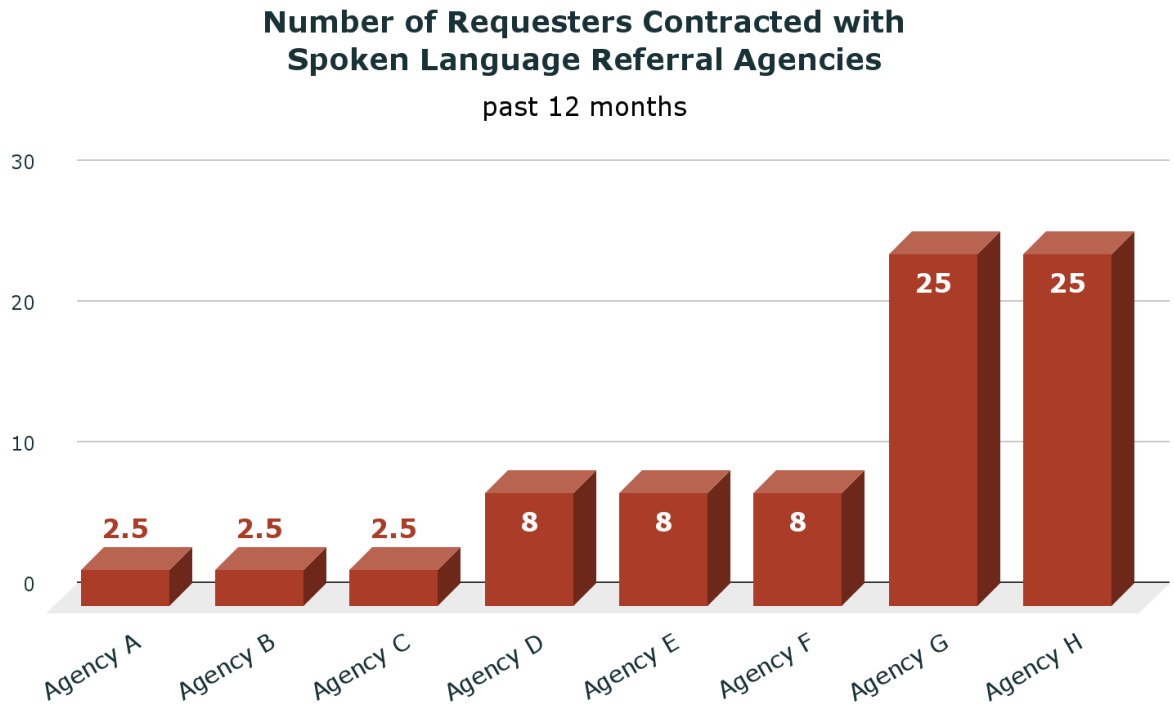

Figure 8: Number of Requesters Contracted with Spoken Language Referral Agencies in the Last 12 Months

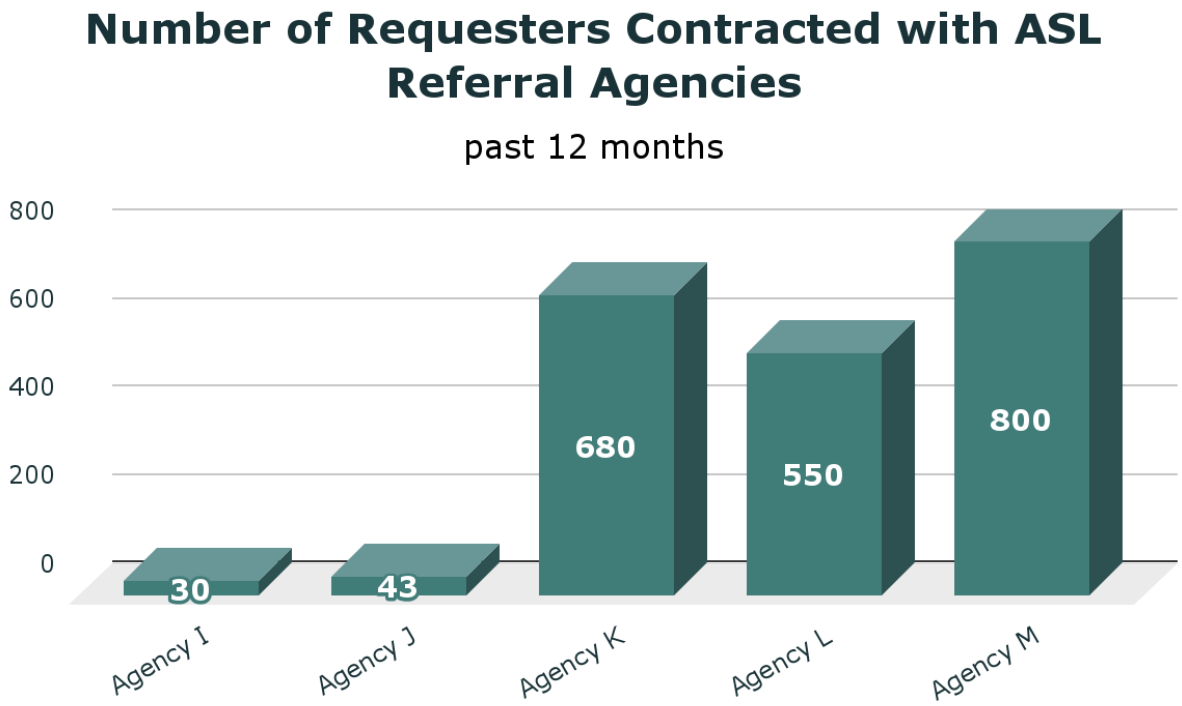

Figure 9: Number of Requesters Contracted with ASL Referral Agencies in the Last 12 Months

One crucial question in the Referral Agency survey centered on the frequency of unfulfilled requests. To contextualize this data, the survey also requested Referral Agencies to provide the average monthly number of requests they receive for ASL interpreting services. Several agency representatives opted to respond with a range. In such cases, the average of the range was utilized. For clear comparison of statistics between ASL Referral Agencies and Spoken Language Agencies, the collected data is presented in two separate tables *(Figures 10 & 11)*.

ASL Referral Agency Unfilled Request Rate			
	Avg. Number of ASL Requests/month	**Avg. Number of Unfilled ASL Requests/month**	**Percentage Unfilled**
Agency 1	30	2	6.6%
Agency 2	27	0.5	2%
Agency 3	1,164	130	11%
Agency 4	1,400	60	4%
Agency 5	2,000	50	2.5%
Agency 6 **Did not Answer*	-	-	-

Figure 10: ASL Referral Agency Unfilled Request Rate

Spoken Language Referral Agency Data for Arizona Interpreting Requests			
	Avg. Number of ASL Requests/month	**Avg. Number of Unfilled ASL Requests/month**	**Percentage Unfilled**
Agency 1	0-10	unsure	-
Agency 2	0-10	“most”	50-100%
Agency 3	0-10	6	60%
Agency 4	1 potential contract	unknown	-
Agency 5	26-50	“most”	50-100%
Agency 6	50-100	50%	50%
Agency 7	100	40	40%
Agency 8	26-50	varies	85% in Tucson 25% in Phoenix

Figure 11: Spoken Language Referral Agency Data for Arizona Interpreting Requests

Referral Agencies offering in-person services highlighted that 90-100% of the unfilled assignments in Arizona are for in-person appointments. Expanding the interpreter pool nationally for VRI appointments significantly improves their chances of filling these requests. However, some Referral Agencies noted that while they can fulfill the majority of VRI assignments in Arizona, licensure requirements make that process more difficult than it is for deaf consumers in other states.

Lastly, surveys asked Interpreter Referral Agencies what types of requests are the most challenging to fill *(Figure 12)*.

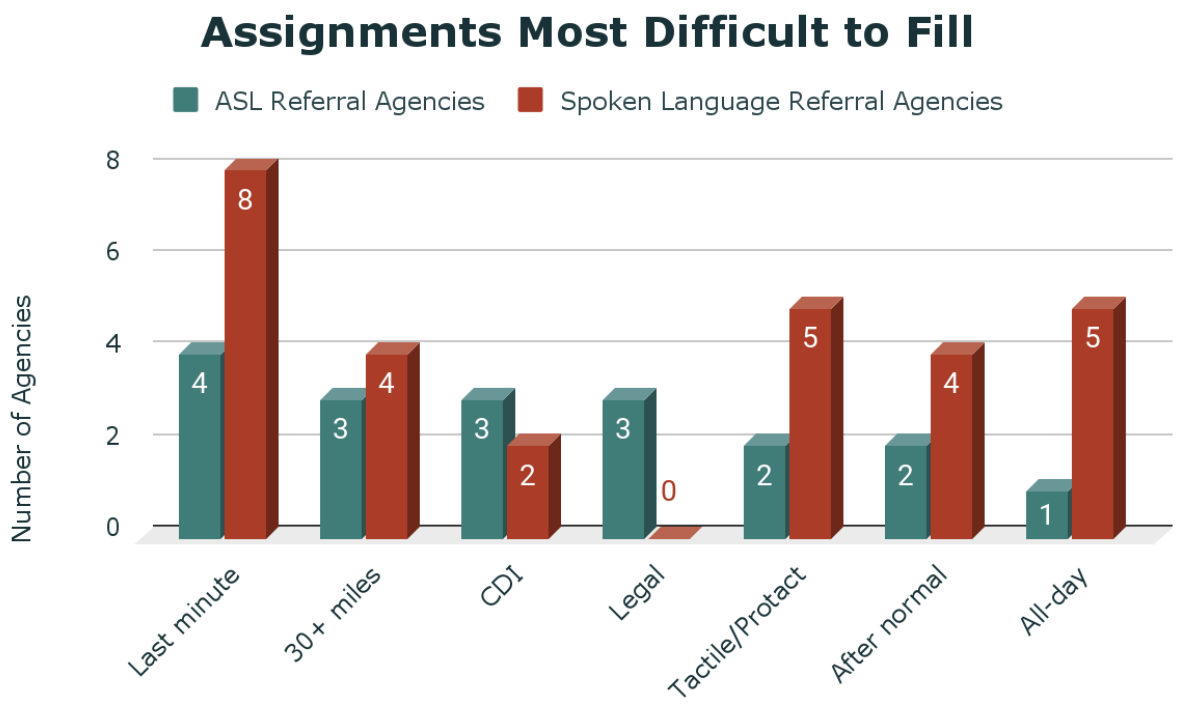

Figure 12: Assignments Most Difficult to Fill

The data presented in the preceding charts appears to corroborate market research findings indicating that small, local ASL-focused referral agencies remain the primary providers of ASL interpreting services in Arizona.[11] Information about the number of interpreter cancellations and CDI requests were not available due to Referral Agencies' insufficient records or concerns about confidentiality..

[11] Nimdzi (2021)

While this data sparks interesting discussion points, it's important to acknowledge that several ASL and Spoken Language Referral Agencies, including some larger companies, may not have taken part in these surveys.

Hiring Entities

Businesses seeking ASL interpreting services represent an essential yet frequently overlooked stakeholder group. Because the services they request are legally mandated - an obligation that often comes as a shock - this stakeholder group can have noticeably different motivations than other stakeholders.[12]

For this study, Hiring Entities contacted were businesses and organizations known for regularly requesting ASL interpreters. These entities encompass several categories, including K-12 and post-secondary education, private businesses and non-profit organizations, courts, government entities, healthcare providers, and performance venues. The participating Hiring Entities provided this information via an anonymous online survey.

The Hiring Entities that received the survey were encouraged to spread the word about the project within their networks. Consequently, some categories of hiring entities have a higher number of completed surveys than were initially distributed *(FIgure 13)*.

[12] Nimdzi (2021)

Survey Completion Rates for Hiring Entities			
	Number of Surveys Offered	**Number of Surveys Completed**	**Percentage Completed**
Educational Institutions	12	11	91.7%
Private Businesses/ Non-Profits	7	2	28.6%
Courts	5	8	160%
Government Entities	5	11	220%
Healthcare Providers	35	5	14%
Performance Venues	6	4	66.7%

Figure 13: Survey completion rates from each hiring entity category

To compare the data collected from Interpreter Referral Agencies, Hiring Entities were asked for information regarding the monthly number of ASL interpreting hours they request, as well as an average number of unfilled requests *(Figure 14)*. These numbers do not include the hours of interpreting services provided by staff interpreters at these organizations.

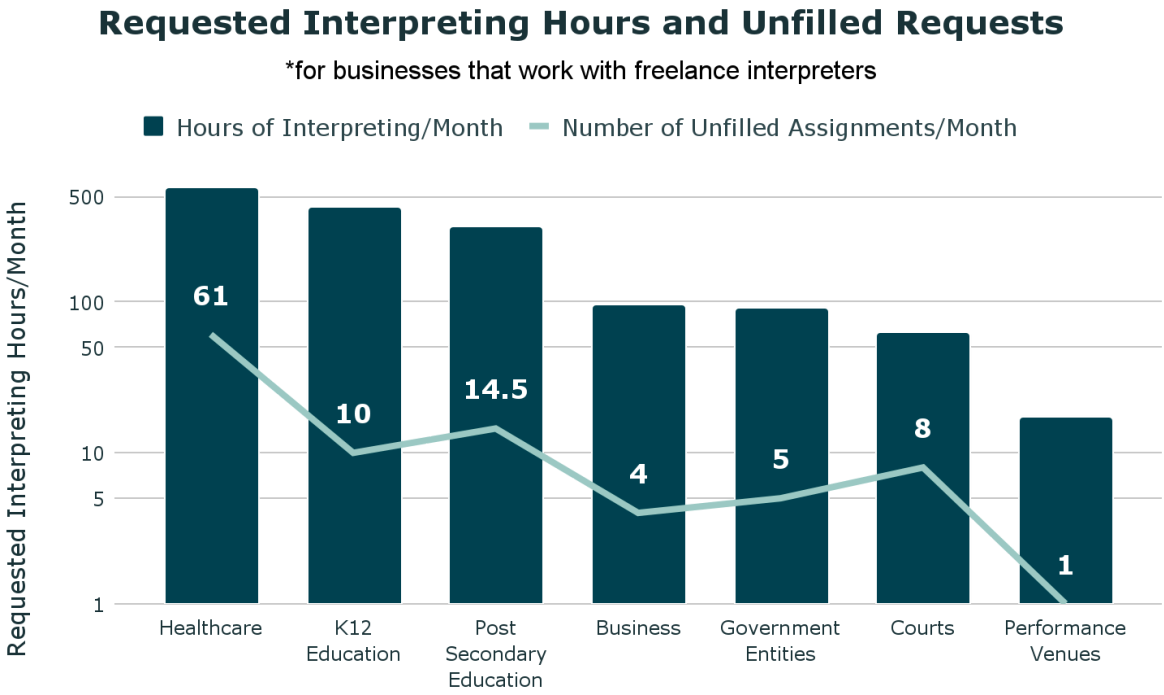

Figure 14: Average number of requested ASL interpreting hours and unfilled requests

Gathering data on interpreting work for clear comparisons can be challenging due to the diverse employment options for ASL interpreters and the varying needs of hiring entities. Respondents shared information in different formats, including percentages, ranges, hours, and event counts requiring ASL interpreting services. Some figures were adjusted slightly to ensure clarity in comparison.

Hiring Entities were also asked to share the number of open staff positions for ASL interpreters, as well as the length of time those positions have been open *(Figure 15)*. Several Hiring Entities shared that they previously had staff positions open for many years. A healthcare entity said they have “some” open positions and use VRI in the interim. Two courts shared that they each had a staff ASL position open for many years, as well. One court shared that their ASL position was never filled because the salary was not competitive, while the other court transitioned their open ASL interpreting position to a spoken language interpreter.

Available Staff Positions for ASL Interpreters					
	Number of Staff Positions Available	**Time Position Has Been Available**	**Business Type**	**Current ASL Interpreter Employment Status**	**ASL Interpreter Hourly Rate**
Hiring Entity 1	1	Many years	Court	Freelance	N/A
Hiring Entity 3	2	1 year	K-12 Education	Staff	$22-28/hr.
Hiring Entity 4	2.5	1 year	K-12 Education	Mix of Staff & Freelance	$28/hr.
Hiring Entity 5	6	9 months-many years	K-12 Education	Mix of Staff & Freelance	$20-28/hr.

Figure 15: Available Staff Positions for ASL Interpreters

ASL Interpreters

Finally, the anonymous survey was distributed among the ASL interpreting community. As of the writing of this report, there are 930 interpreters holding an active Arizona license, with 43% residing in states other than Arizona. Not included in this count are interpreters employed in the K-12 educational setting. Since many K-12 interpreters lack an Arizona license, and there is no existing registry of K-12 interpreters in Arizona, determining the total ASL interpreter population in the state poses a challenge.

ASL interpreters eligible for this survey either needed an active Arizona interpreting license or had to reside and work in Arizona, irrespective of licensure or certification status. The survey was sent to all Arizona licensed interpreters via the ACDHH licensure database and shared in Arizona ASL interpreter Facebook groups. ACDHH also requested several entities working with numerous K-12 interpreters to distribute the survey within their networks. Since the survey was publicly shared on social media and promoted through multiple channels, calculating its response rate is not feasible. A total of 325 interpreters filled out the survey.

Figures 16 - 18 highlight basic information about the interpreters who participated in this study, including their hearing status, location, and license levels.

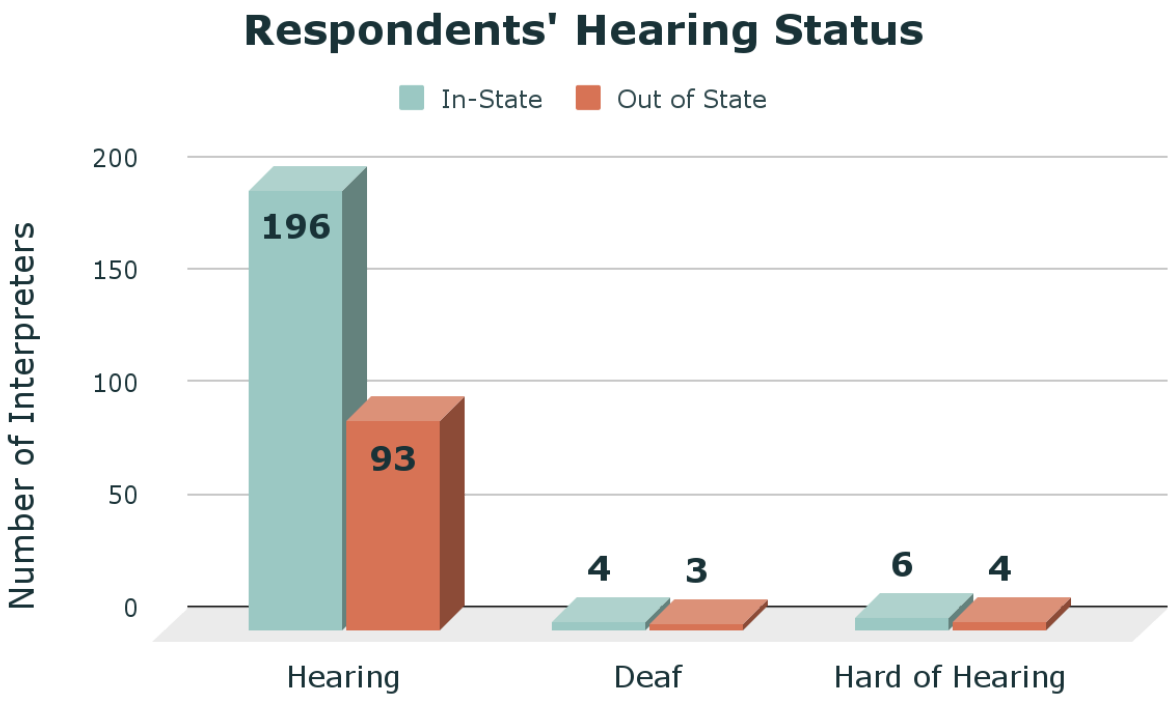

Figure 16: ASL Interpreter Respondents' Hearing Status

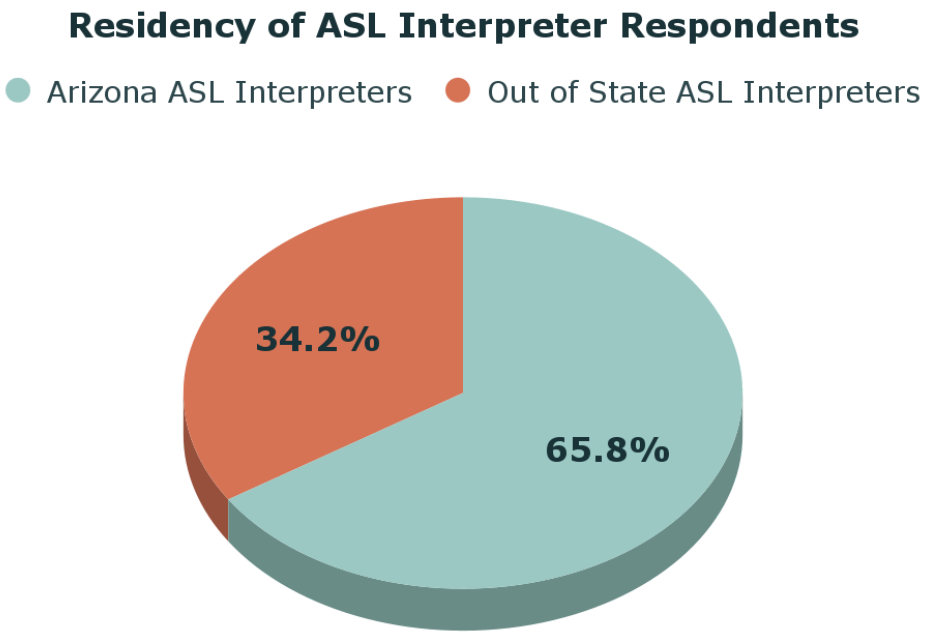

Figure 17: Residency of ASL Interpreter Respondents

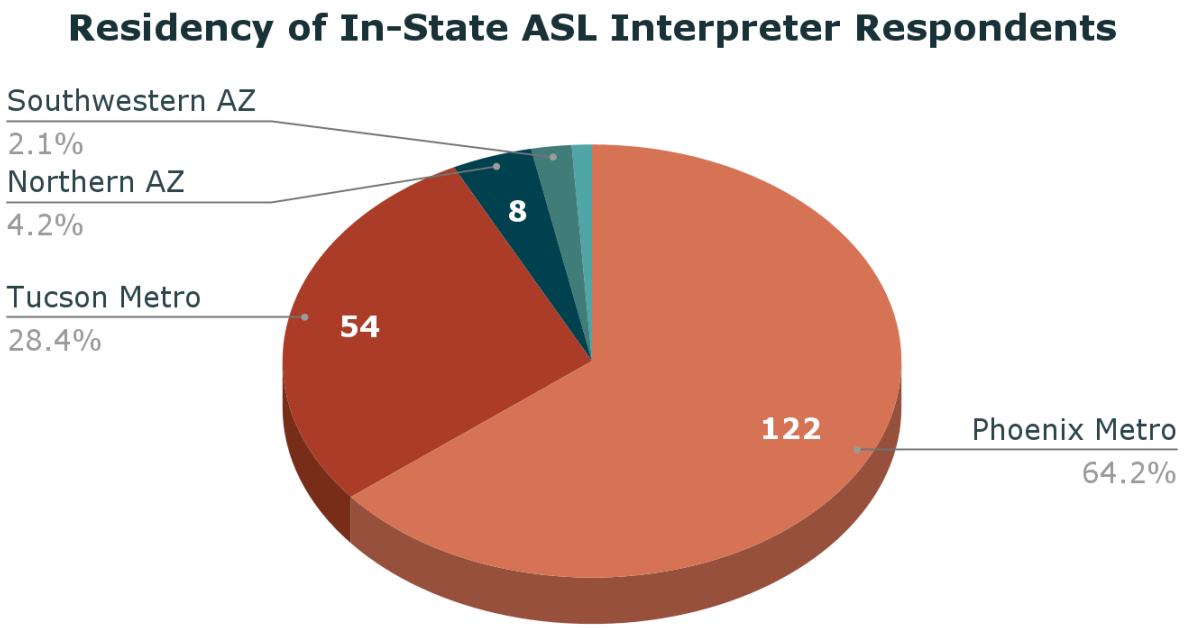

Figure 18: Residency of In-State Interpreter Respondents

We also asked Interpreters about the number of Interpreter Referral Agencies they are affiliated with *(Figure 19)*. Referral Agencies could mean a local or out-of-state Referral Agency that coordinates in-person or VRI assignments. Affiliation, in this sense, simply means that the Interpreter is on that Referral Agency's roster and regularly receives emails from the Referral Agency about available interpreting assignments. It does not specify whether interpreters regularly accept work from all of the Referral Agencies from which they are affiliated.

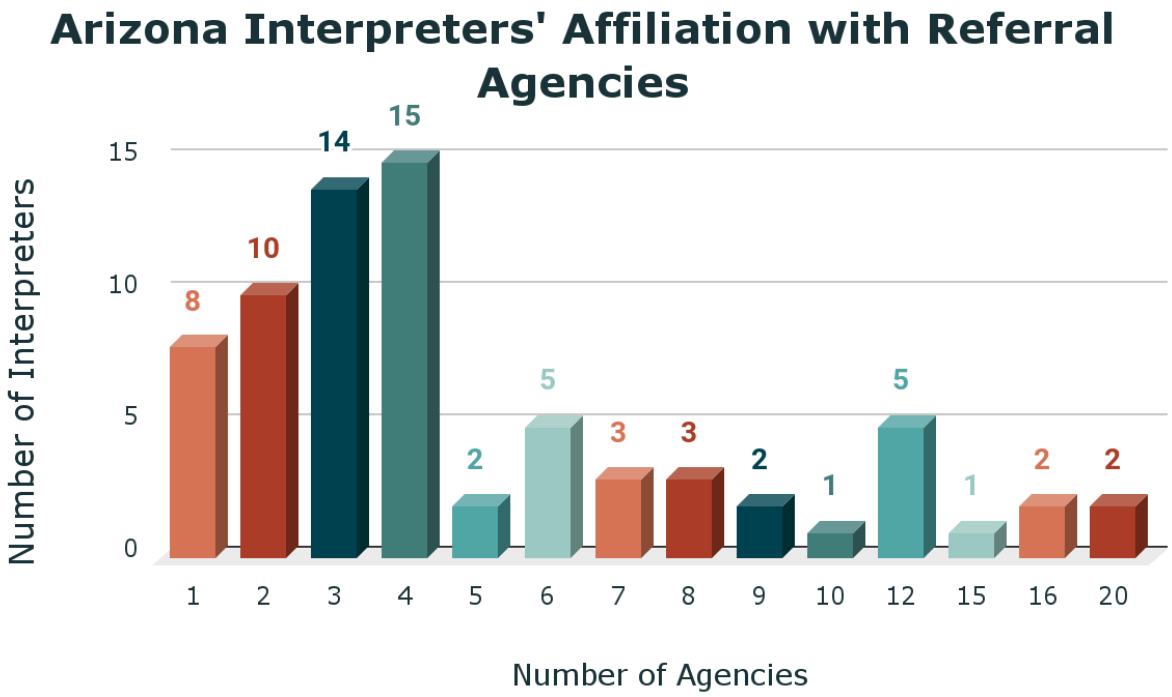

Figure 19: Arizona Interpreters' Affiliation with Interpreter Referral Agencies

In the next section, we turn our attention to the empirical findings gleaned from this study. Our investigation delves into potential causes for the interpreter shortage with a detailed analysis of current and historical data correlating to these challenges. This study is not only intended to share the data collected, but also to make connections between stakeholders' that are often siloed within each community. In doing so, this report may serve as a "state of the state" for the ASL interpreting field in Arizona.

Possible Causes for the ASL Interpreter Shortage

Introduction

The field of ASL interpreting has faced considerable instability since its inception in the 1960s. Before then, deaf consumers primarily relied on voluntary assistance from friends and family members. However, with the establishment of RID and the enactment of federal laws increasing demand for services, efforts have been made to professionalize the field.

Professionalization, as defined by the National Center for Education Statistics, is the process where occupations seek to elevate their status by adopting attributes and traits associated with professions.[13] This journey towards professionalization is intricate and time-consuming, akin to fields like medicine, law, and engineering, which are considered to have attained a stable level of professionalization.

Professionalization of an occupation shifts decision-making authority from deaf consumers to formal education programs, credentialing bodies, interpreter referral agencies, and service requesters - many led by people with limited understanding of the deaf or interpreting communities.

In both spoken and signed language interpreting, there's widespread agreement that professionalization is a valuable goal benefiting practitioners and consumers. However, there are opposing views, as well. Traditionally, non-professional ASL interpreters received informal training and acceptance from the deaf community themselves. Professionalization shifts decision-making authority from deaf consumers to formal education programs, credentialing bodies, interpreter referral agencies, and service requesters—many led by hearing individuals with limited ties to the deaf or interpreting communities. This transition from relational to transactional dynamics was succinctly described by a survey respondent who likened the interpreting shortage to "the McDonaldization of our profession." Striking a balance between transactional and relational aspects remains a significant challenge in the field.

[13] Witter-Merithew & Johnson, (2004)

To understand the professionalization process for signed language interpreters, Witter-Merithew & Johnson conducted a 2004 study using Tseng's Model of Professionalization.[14] This model, adopted by several states for their own interpreter needs assessment studies, outlines the phases an occupation goes through in its professional development.[15] Witter-Merithew & Johnson also applied Tseng's concept of "market disorder" to identify challenges within the profession that affect operations and service delivery.[16] Based on these theories, they positioned the ASL interpreting field along a continuum of professionalization.

Figure 20: Professionalization Continuum for ASL Interpreting (Witter-Merithew & Johnson, 2004)

According to Witter-Merithew & Johnson, ASL interpreting largely aligns with the characteristics of an emerging profession, with some exceptions. Firstly, Tseng's model typically indicates the onset of market disorders early in the professionalization process, with credentialing occurring later.[17] However, in the sign language interpreting field, certification standards and procedures were established early on, while market disorders have persistently existed. Furthermore, standardized degree and credentialing are essential attributes for an occupation to be classified as an emerging profession. Presently, the field of ASL interpreting lacks uniformity in academic or certification requirements, both nationally and within Arizona.

[14] Witter-Merithew & Johnson, (2004)
[15] Louisiana Interpreter Needs Assessment (2023); Washington Interpreter Shortage Study (2024)
[16] Witter-Merithew & Johnson, p. 2 (2004)
[17] Witter-Merithew & Johnson (2004)

Witter-Merithew & Johnson also employed Tsang's Trait Theory, a prominent theory in professionalization studies. Trait Theory asserts that specific characteristics differentiate a profession from an occupation, and a field's professionalization level correlates with the number of traits it has acquired.[18] Details of Tseng's Trait Theory characteristics and their definitions can be found in Figure 21.

Trait	Definition
Systemic Theory	A set of abstract concepts that describe the focus of professional service
Authority	Extent of collective influence practitioners have over the policy making & practice
Credentials	Acquisition of academic & professional recognition to satisfy established standards
Induction	System of transitioning new practitioners into the profession
Code of Ethics	Public statement regarding service mission & duty owed by the profession
Compensation	Range of salary & benefit options
Continuing Professional Development	System of ongoing availability & acquisition of contemporary knowledge & skills
Community Sanction	Public recognition of services defined in practice standards
Culture	Evidence of collective identity via formal & informal networks

Figure 21: Tseng's Trait Theory characteristics (Witter-Merithew & Johnson, 2004)

In the surveys distributed to five of the major stakeholders within the ASL interpreting field, each stakeholder group was asked for their opinions regarding the root causes of the ASL interpreting shortage. Major themes emerged from the responses and will be analyzed using the framework of Tseng's Trait Theory characteristics.

[18] Witter-Merithew & Johnson (2004)

An Overview of Becoming a Professional ASL Interpreter in Arizona

Before diving into survey results, let's explore the typical path to becoming an ASL interpreter in Arizona. Most start by attending an Interpreter Education Program, with several options available in the state *(see Appendix J)*.

After graduation, interpreters have three testing options: RID national certification, the Texas Board of the Evaluation of Interpreters (BEI) state test, and the Educational Interpreter Performance Assessment *(see Appendix K)*. However, most Interpreter Education Programs acknowledge that achieving language fluency and proficient interpreting skills typically takes more than 2-4 years. Graduates may have completed coursework but may lack the necessary skill or experience to start interpreting professionally.

Novice interpreters often find work opportunities limited to K-12 educational settings where Arizona licensure isn't required. For those opting out of K-12, skill-building options include workshops, mentorship, and volunteering, although these resources can be difficult to find. Provisional C license holders can earn money from interpreting work when paired with a certified, licensed interpreter, though opportunities from referral agencies are limited. Provisional B license holders tend to have more work opportunities outside of K-12 settings, however transitioning from a Provisional C to a Provisional B has proven challenging for most.

Those who pass the BEI or RID certification tests and obtain a General license can work independently in all settings except those legal in nature. Interpreters sub-contract with Interpreter Referral Agencies as independent contractors, as that is the route most ASL work is filtered through.

Trait 1: Systemic Theory

Systemic Theory emphasizes the formal procedures through which knowledge and skills are transferred from one generation of practitioners to the next. This process often involves attending an Interpreter Education Program, as mentioned earlier. Witter-Merithew & Johnson rated ASL interpreting as "moderate" in terms of Systemic Theory due to the inconsistent education standards across the country.[19]

[19] Witter-Merithew & Johnson (2004)

Arizona's ASL interpreters exemplify the inconsistent education standards noted by Witter-Merithew & Johnson. Figure 22 compares education levels from national surveys in 2012 and 2014[20] with recent 2024 Arizona survey results.[21] One discrepancy is that the national surveys combined Certificates and Associate's degrees, while the Arizona survey separated them. Currently, around 80% of Arizona respondents have some formal education, contrasting with national averages of approximately 90% a decade ago.

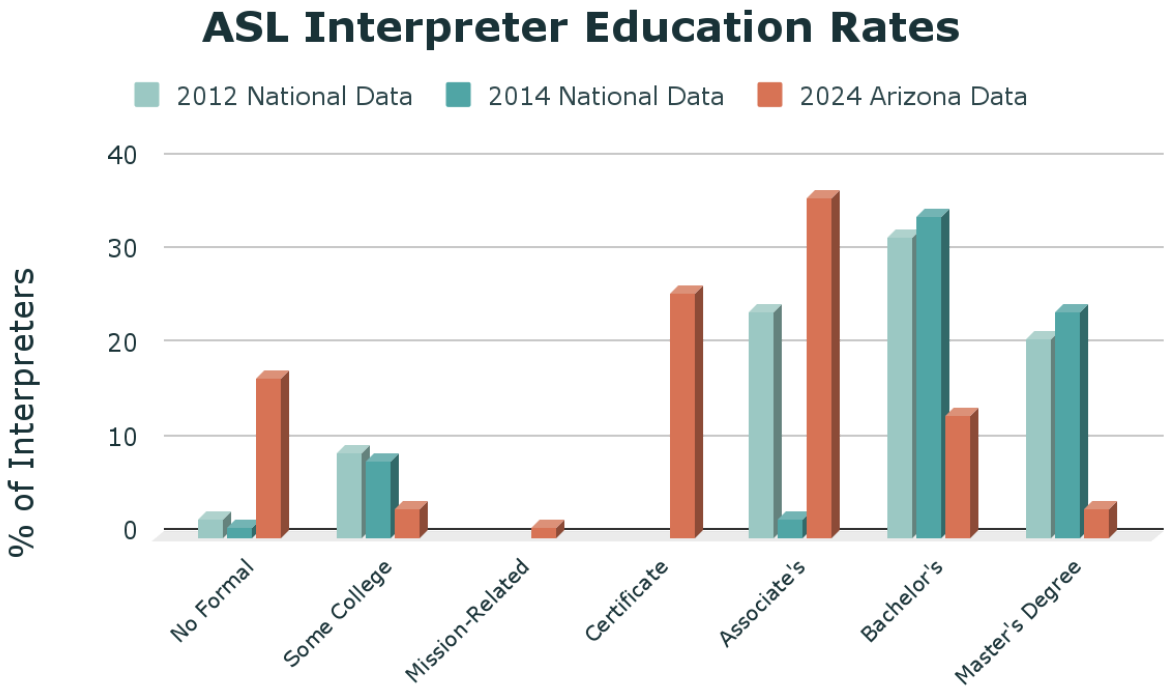

Figure 22: Arizona ASL Interpreter Education Rates

As the field of ASL interpreting has evolved, so have the institutions responsible for training future practitioners. The rapid professionalization of the field led to the expedited development of curricula. Interpreter Education Programs face the challenge of imparting skills without adequate pedagogical support within a condensed time frame. As one survey respondent noted, "People expect (Interpreter Education Programs) to create certified interpreters, and that's not possible."

[20] NIEC Report on the National Needs Assessment Initiative (2016)
[21] Monahan (2022)

Some interpreters expressed concerns about the effectiveness of Interpreter Education Programs contributing to the interpreting shortage. Interestingly, many of these interpreters were from other states, possibly reflecting issues with their local programs rather than a legitimate challenge in Arizona. Arizona interpreters who mentioned Interpreter Education Programs as a potential cause for the shortage emphasized the need for more Bachelor's programs, increased involvement of the Deaf community in interpreter development, and the impact of COVID on enrollment and skill development.

Interpreter Education Programs participating in this study reported a post-COVID enrollment decline of 15-60%, varying by semester. Additionally, one ASL Referral Agency noted a significant decrease in newly certified or recent graduates added to their roster compared to a decade ago.

Both interpreters and ASL Referral Agencies remarked on the diminished skill level of graduates trained during the pandemic. Programs observed that students who received most or all of their ASL education online were less likely to demonstrate the necessary linguistic proficiency for acceptance into their programs. This trend is noteworthy as more schools offer virtual ASL and interpreting classes.

Furthermore, one Interpreter Education Program provided statistics on their students' post-graduation achievements *(Figure 23)*. It's worth noting that students with "no data" are presumed not to have pursued careers in interpreting

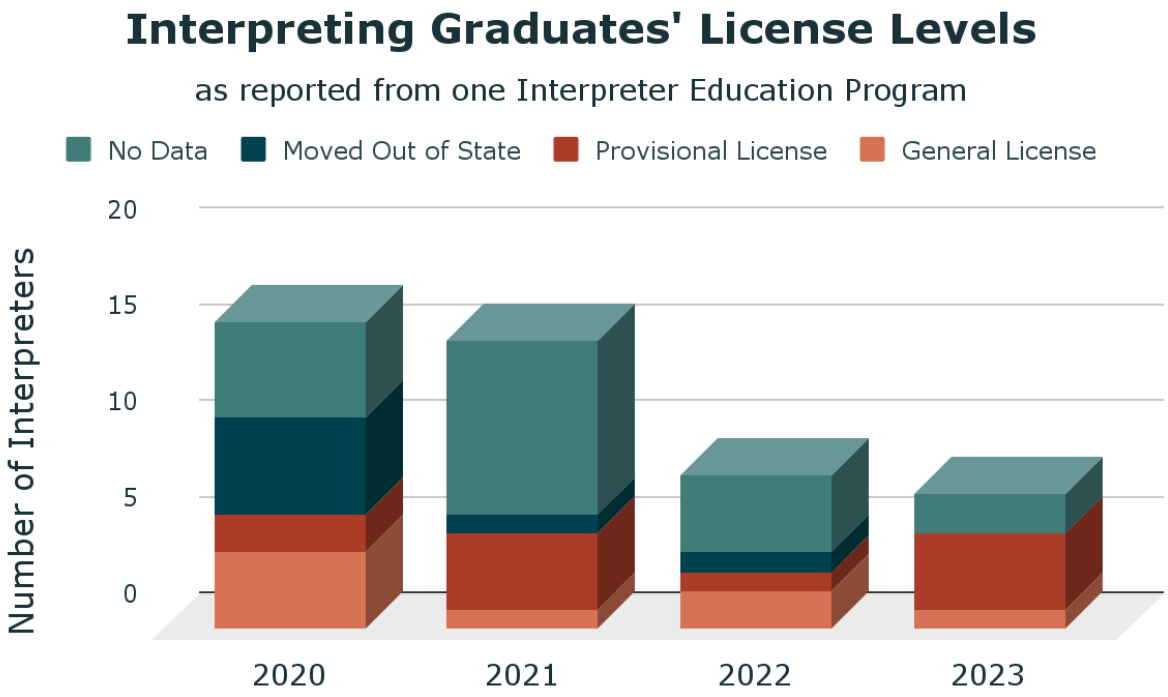

Figure 23: Interpreting Graduates' License Levels from One Interpreter Education Program

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Interpreter Education Programs faced unforeseen challenges during the pandemic. Virtual classes made it difficult for instructors to assess students' cognitive abilities essential for ASL interpreters, including critical thinking, fluency of ideas, and social perceptiveness.[22] Additionally, online ASL classes lacked the community-building, immersive experience of in-person learning with deaf teachers. This may have denied students the connection that so often prompts them into the interpreting field. Moreover, the increasing availability of ASL instruction in Arizona schools has led to under-qualified teachers filling positions, prompting Interpreter Education Programs to assess students' ASL skills and often requiring them to start from scratch in ASL 101.

[22] BEI Study Guide for Interpreter Certiication Candidates (2012)

Despite the need for improvements in Interpreter Education Programs nationwide, Arizona possesses notable advantages with its existing programs. Firstly, the state offers three programs that provide varying levels of ASL interpreter education, including an Associate's program at a community college and a Bachelor's program at a state university. Secondly, the Educational Interpreting program at the University of Arizona offers students a tuition stipend in exchange for committing to work in a K-12 setting, making a Bachelor's degree accessible to many who might otherwise be unable to afford it. Lastly, the Interpreter Preparation Program at Phoenix College recently attained accreditation from the Commission on Collegiate Interpreter Education (CCIE), becoming only the fourth Associates-level program in the country to do so. This accreditation significantly benefits students, as it strongly correlates with post-graduation success in obtaining interpreter certification."[23]

The increasing availability of ASL instruction in K-12 schools has led to under-qualified teachers filling positions, prompting college Interpreter Education Programs to assess incoming students' ASL skills and often requiring them to start ASL classes from scratch.

Ultimately, "until there is collective agreement about entry and exit criteria for IPP programs, scope and sequence of what should be taught supported by an appropriate length of study, whether accreditation of training programs is mandatory versus voluntary, and what constitutes minimum market-entry competence, the trait of systemic theory will be unable to move beyond emergent."[24]

Trait 2: Authority

An occupation's authority measures "the extent of influence collectively wielded by practitioners over the policy making that impacts (their work)."[25] Professions with high degrees of authority have the expertise and respect from strong alliances with policymakers to define the public policy related to their field.[26]

ASL interpreters and the deaf community consistently face challenges regarding their authority, even under laws aimed at safeguarding accessibility rights. Title III of the Americans

[23] Louisiana Interpreter Needs Assessment (2023)
[24] Witter-Merithew & Johnson p.7 (2004)
[25] Witter-Merithew & Johnson p.7 (2004)
[26] Witter-Merithew & Johnson (2004)

with Disabilities Act (ADA) not only assigns decision-making power to the accommodating entity for determining appropriate accommodations but also lacks a precise definition for professional interpreters.[27]

Some states, such as Arizona, mandate certification and licensing for ASL interpreters working outside of K-12 education. Many other states have no such requirements, resulting in individuals, who have the authority to choose a deaf person's accommodation, unknowingly hiring ineffective service providers who claim to be qualified ASL interpreters.[28] Without legal mandates to empower the deaf and interpreting communities, credentialed practitioners must often advocate for their profession by educating supervisors, business owners, and government entities about the essential skills needed to ensure effective communication for deaf consumers. According to Witter-Merithew & Johnson, the field of ASL interpreting demonstrates a low authority due to the lack of a standardized agreement for entry-level competency, non-practitioners retaining the authority for who provides the service, and very limited power over working conditions and standards.[29]

Survey responses from four out of five stakeholder groups support this assessment, particularly concerning Video Relay Service (VRS), Video Remote Interpreting (VRI), Referral Agency Business Practices, and K-12 Interpreting.

VRS/VRI

VRS and VRI technologies represent some of the most significant and impactful changes witnessed in the interpreting and deaf communities over the past 20 years. While these technologies offer inherent benefits to the deaf community, their widespread use has also brought about numerous unintended consequences.

Surveys from Interpreters, Hiring Entities, and ASL Referral Agencies revealed 28 comments regarding the impact of VRS/VRI industries on the interpreter shortage. Many expressed concerns that these industries exacerbated the strain on local interpreting resources by spreading the interpreting pool across the nationwide deaf population, leading to a significant reduction in available interpreters for in-person assignments. To investigate further, survey

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[27] ADA Title III (2024); ADA Requirements: Effective Communication (2024)
[28] RID State-by-State Regulations (2024)
[29] Witter-Merithew & Johnson (2004)

responses from interpreters residing in Arizona were compared with national survey data from 2007 and 2009.[30] *(Figure 24).*

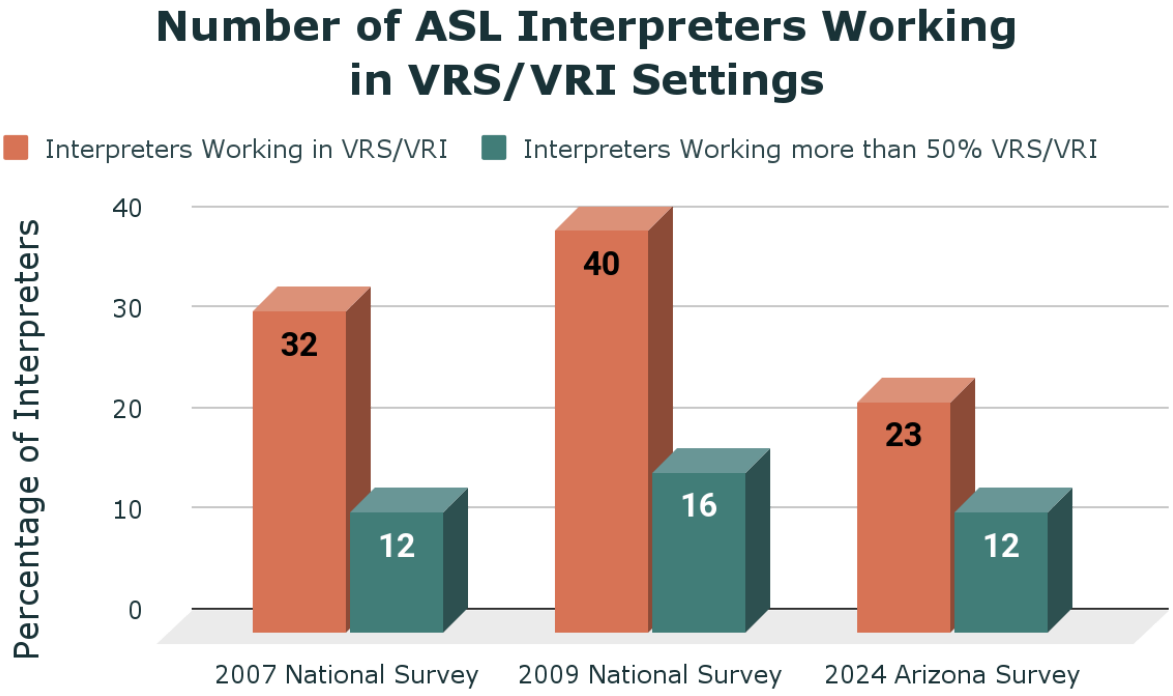

Figure 24: A Comparison in the Number of ASL Interpreters Working in VRS/VRI Settings

While statistics for Arizona VRS/VRI interpreters may be lower than historical national averages, the data remains significant for several reasons. Firstly, within the last five years, all three VRS call centers in the Phoenix area shut down. While some companies offered remote work opportunities, stringent environmental and scheduling requirements deterred many interpreters. Moreover, Arizona licensure laws mandate specific credentials for interpreters, including those working for VRS/VRI companies in Arizona. While this ensures interpreters meet entry-level requirements, it also increases costs, potentially prompting VRS/VRI companies to seek interpreters in other markets.

VRS and on-demand VRI interpreting poses unique ethical challenges. Due to the prioritization of billable minutes over effective interpreting, connection with callers, or interpreter health, studies show VRS/VRI interpreters endure the highest physical and psychological health

[30] NCIEC Interpreter Practitioner Needs Assessment Trends Analysis Report (2010)

risks, leading to declines in linguistic and cognitive abilities, physical stamina, and emotional stability, as well as burnout and depersonalization.[31]

Interpreters have long sought policy changes, including attempts at unionization for better conditions. VRS companies have historically blamed FCC regulations for many of their policies, while the FCC points the finger back at VRS companies. This led one survey respondent to write "VRS has created an 'assembly line' mentality. We are no longer treated as human beings but as an expendable resource. This is causing people to leave the field, or dramatically shift their work to specific environments where they are not receiving this sort of attitude/treatment."

An unofficial poll in an Arizona interpreter Facebook group found 93% of the interpreters who responded had no intention of working in VRS settings. As one Hiring Entity respondent wrote, the pattern of VRS companies "consuming and discarding" ASL interpreters could be a huge contributor to the interpreter shortage problem. The severe burnout experienced by many VRS interpreters not only caused some to leave VRS, but the field of interpreting altogether.

"VRS has created an 'assembly line' mentality. We are no longer treated as human beings but as an expendable resource."

- Arizona-licensed interpreter

VRI work also comes with its own set of challenges for ASL interpreters. Although VRI has many benefits and is used consistently in almost every setting, it remains a widely unpopular accommodation for the deaf community, especially when used as an "on-demand" service, as is widely available in the medical field.[32] ASL, being three-dimensional, loses clarity when forced onto a two-dimensional screen.[33] The deaf community has faced collective trauma due to VRI's overuse and unethical application.

In the 2016 report "Understanding the Challenges of Interpreters Working in the Video Medium" from the National Interpreter Education Center, the author stated:

Interpreters providing VRI services need excellent signing skills to compensate

[31] Humphrey p. 16 (2015)
[32] Nimdzi (2021)
[33] Nimdzi (2021)

> for the two-dimensional screen, and strong interactional management skills to help them gather information that is not readily visible or audible from their vantage point. The VRI interpreter also needs to have the discernment to know when the process is not working, the assertiveness to say so, and the resources to recommend timely and appropriate alternatives. Unfortunately, many interpreters currently working in VRI are not up to the task, particularly in complex medical and legal situations of high consequence involving specialized terminology.[34]

Unfortunately, many on-demand VRI companies prioritize cost savings over quality, often disregarding Arizona licensure requirements. Survey results from out-of-state Arizona licensed interpreters revealed that 46% could not verify the location of their callers, making it impossible for interpreters to know whether they are satisfying states' licensure laws. One ASL Referral Agency shared that it's practically impossible for a company to provide on-demand VRI and be in compliance with Arizona's licensure laws. While compliant agencies lose contracts, those that flout the law succeed.

Despite these challenges, and a consistent message from the deaf community that VRI should be avoided in healthcare and legal settings whenever possible, many of the interpreters providing VRI services to deaf Arizonans report work in both of these settings *(Figure 25)*.[35]

[34] NIEC Understanding the Challenges of the Video Medium, p.4 (2016)
[35] Nimdzi (2021)

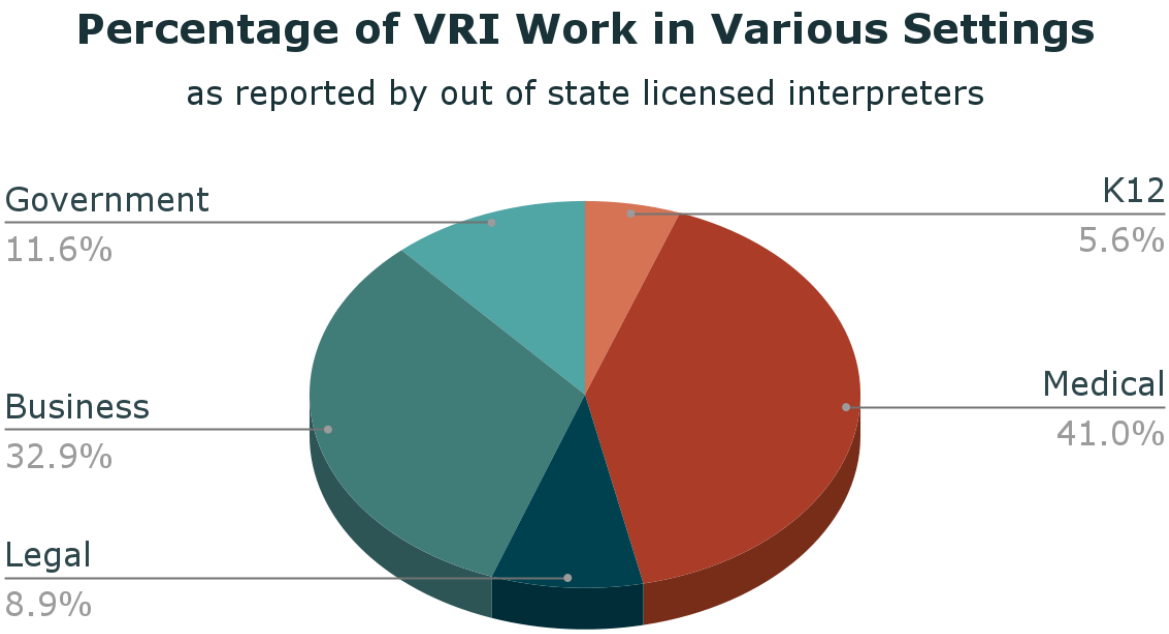

Figure 25: Percentage of VRI Work in Various Settings

It's clear that VRS and VRI companies, and the businesses that contract with them, define the level and quality of ASL interpreting services they provide. The level of authority accepted from the ASL interpreting community - and even worse, from the deaf consumers themselves - has proven to hold little weight in these industries.[36]

Referral Agency Business Practices

Survey responses regarding Referral Agency Business Practices highlight another area where ASL interpreters lack authority. 88% of ASL interpreters reported working at least partially as independent contractors. While independent contractor status typically allows individuals to set their own terms, this is not entirely true for ASL interpreters working through Interpreter Referral Agencies.

Standardized working conditions for ASL interpreters has been a point of discussion for decades. Working conditions for ASL interpreters include pay, benefits, scheduling, teaming,

[36] NIEC Report on the National Needs Assessment Initiative (2016)

supervision, and mentoring, among other things.[37] At the 1993 RID convention, discussions regarding standardizing certain working conditions was a priority; those discussions continue to this day.

In the past, when ASL interpreting work was predominantly coordinated through local ASL Referral Agencies, there may have been a greater sense of standardization within specific areas. However, with ASL and Spoken Language Referral Agencies now securing national contracts and bidding for work across states, the lack of standardization has become more apparent.

In the survey conducted for this study, ASL interpreters were asked to prioritize characteristics when choosing an Interpreter Referral Agency *(Figure 26*). The majority of interpreters indicated a preference for agencies with a strong understanding of the Deaf community and ASL interpreting. Additionally, they favored local agencies specializing in coordinating services for ASL interpreters over those offering services for multiple languages. These preferences have a direct correlation with ASL interpreters' authority, as the businesses they prefer to work with are the same who respect interpreters' roles, industry standards, and professional autonomy.

ASL Interpreters' Top Referral Agency Characteristics
1. Understanding of the Deaf community and the ASL interpreting field
2. Local agencies that primarily work with ASL interpreters
3. Honors Deaf consumers' preferences
4. Easy scheduling/invoicing procedures
5. Follows accepted industry standards
6. History of working together
7. Pays preferred wage
8. No excessive requirements for hire (fingerprint clearance card, vaccines, etc.)
9. Has integrity; values ethics over profit
10. Makes sure adequate job details are provided

Figure 26: ASL Interpreters' Top Referral Agency Characteristics

Spoken Language Referral Agencies

Multiple comments from the surveys referred to the business practices of Spoken Language Referral Agencies. In the past 10 years, there has been a noticeable increase in Spoken Language Referral Agencies marketing ASL interpreting services, despite a lack of understanding about the Deaf community or the ASL

[37] Schwartz (2008)

interpreting field.[38] A national survey in 2013 found that 70% of the Interpreter Referral Agencies coordinating ASL interpreting services worked exclusively with sign language.[39] However, according to responses from Hiring Entities in our survey, only 28% of the Referral Agencies they contracted with were ASL-only.

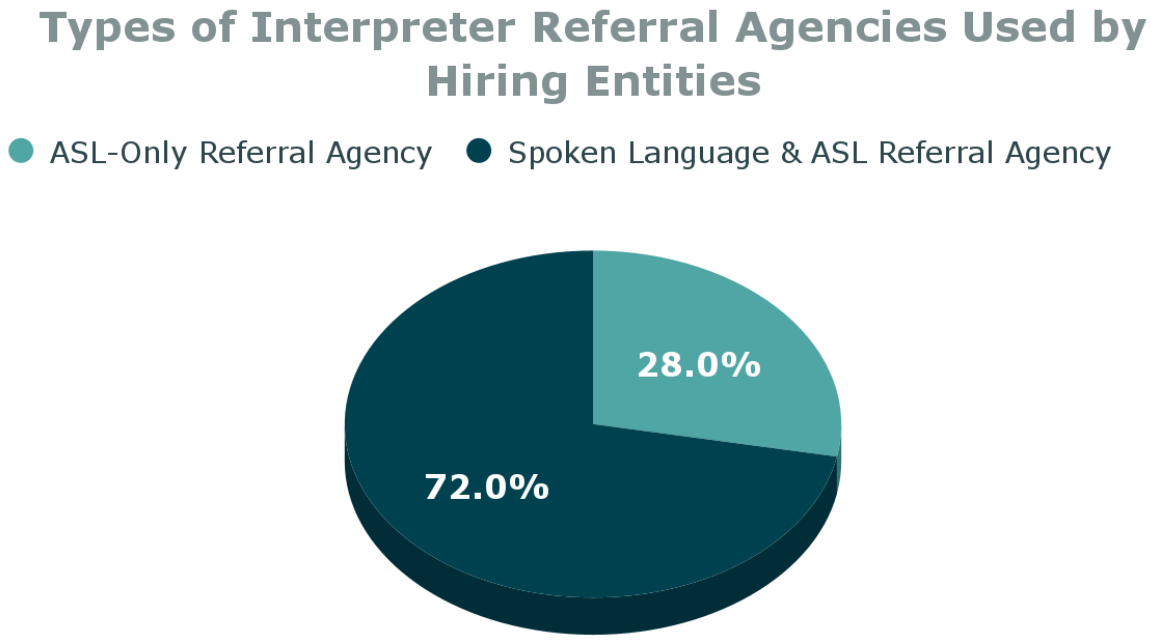

Figure 27: Types of Interpreter Referral Agencies Used by Hiring Entities

Economists have pinpointed a key reason why Spoken Language Referral Agencies struggle in the ASL interpreting market: a lack of appreciation for the unique differences between signed and spoken languages.[40] According to one ASL Agency, Spoken Language Referral Agencies often attempt to subcontract through their company. However, due to their consistent lack of understanding or regard for the Deaf community and the ASL interpreting field, the ASL Agency refuses to work with them anymore.

A notable correlation in the survey data is the heavy reliance of Hiring Entities on Interpreter Referral Agencies to vet interpreters' credentials, including licensure. However, when

[38] Louisiana Interpreter Needs Assessment (2023)
[39] NIEC Report on Referral Agencies Needs Assessment (2013)
[40] Nimdzi (2021)

Spoken Language Referral Agencies were asked about the license level of ASL interpreters they hire, 25% were "unsure". Additionally, one Hiring Entity respondent described the level of detail they share with in-person Interpreter Referral Agencies to ensure they find the right interpreter. However, when working with a Spoken Language VRI company, they lamented, "I have NO control, NO ability to make those specific requests."

Why, then, do Hiring Entities turn to Spoken Language Referral Agencies for ASL interpreting services? The primary motivation appears to be convenience and cost-effectiveness,[41] rather than a respectful understanding of the differences between signed and spoken languages and the cultural nuances inherent in working with the deaf community. If a hospital already has a contract with a Spoken Language Referral Agency that claims to cover ASL interpretation, it's a straightforward decision.

However, what Hiring Entities may not realize is the inundation of "cold call" emails ASL interpreters receive from Spoken Language Referral Agencies or staffing companies, hoping to find someone to fulfill contracts they've already secured. One agency in our survey was in the midst of this process, noting that it's common to receive no responses to such emails. In fact, when asked for possible solutions to the shortage, the Spoken Language Agency's reply was simply, "Tell interpreters to respond to our emails."

80% of interpreters regularly accept work from three Referral Agencies or less, regardless of the total number they're affiliated with.

Hiring Entities may not consider asking an Interpreter Referral Agency how many Arizona-licensed ASL interpreters they have on their roster. The Hiring Entity is likely not aware that an Arizona license exists. Even if that question was asked, however, the Referral Agency's response may still be misleading.

Arizona-licensed interpreters often associate with multiple Interpreter Referral Agencies *(Figure 19*). However, being listed on an agency's roster does not necessarily imply regular acceptance of assignments from that agency. For instance, although a Referral Agency may have 50 interpreters listed, only 20 of them might consistently respond to emails or accept assignments (*see Figure 26 for characteristics of Referral Agencies preferred by interpreters*). When asked how many Interpreter Referral Agencies they accept work from more than once a

[41] Nimdzi (2021)

month, 80% of interpreters regularly engage with three or fewer agencies, regardless of the total number of Referral Agencies they're affiliated with. Among interpreters affiliated with ten or more agencies, they only regularly accept work from an average of 50% of those agencies.

One theory shared by an ASL Agency in our study suggests that the shortage might not be as dire as perceived. They posit that when Hiring Entities request services from an Interpreter Referral Agency that ASL interpreters avoid, the agency may simply claim "no interpreters were available," leaving the deaf consumer wondering where all the interpreters have gone.

These challenges are exacerbated when the Hiring Entity, and consequently, the deaf consumer, are further removed from the process. For instance, insurance companies coordinating interpreting services for patients often navigate requests through multiple intermediaries, typically via a national contract with an out-of-state Interpreter Referral Agency. This disconnect conflicts with the characteristics ASL interpreters value when working with Interpreter Referral Agencies.

While the lack of influence and professional authority among ASL interpreters is apparent in these systems, it's crucial to recognize that deaf consumers often have the least authority in these situations.[42] The Interpreter Needs Assessment Report from the Louisiana Commission for the Deaf states:

> Hiring entities such as doctor's offices, places of employment, and other entities that serve or work with deaf people generally contact agencies to request an interpreter, rather than ask the deaf person to recommend an interpreter for the job. The d/Deaf, DeafBlind, and hard of hearing person usually does not know who their interpreter is until they arrive; thus, they may find that the interpreter is not the right fit or unqualified, but feel pressured to accept what they can get.[43]

Detaching deaf consumers from the process of securing interpreting services deprives them of the opportunity to provide feedback or express their needs to the entity coordinating their communication access. In many cases, Hiring Entities withhold the name of the Interpreter Referral Agency from deaf consumers, compounding the emotional labor and stress involved in accessing goods and services for the deaf community.[44]

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[42] Louisiana Interpreter Needs Assessment (2023)
[43] Louisiana Interpreter Needs Assessment p.18 (2023)
[44] Louisiana Interpreter Needs Assessment (2023)

At this time, there are no mechanisms in place for Interpreter Referral Agencies to be held accountable to their deaf consumers, Hiring Entities, or the ASL interpreters they contract. These potential issues may be worth investigating further to better unpack the systems behind Interpreter Referral Agency business practices.

K-12 Interpreting

Since its inception, K-12 interpreting has faced a lack of authority. The passing of PL 94-142 (now known as the Individuals with Disabilities Education Act, or IDEA) in 1975 drastically increased demand for educational interpreters, overwhelming the field.[45] To comply with the law, schools relied on under-equipped "para-professionals" lacking the necessary knowledge or skills for the job.[46] This led to a warm-body approach, bypassing established certification standards. Consequently, schools established standards of practice and compensation structures without input from the interpreting field.[47] While requirements have improved since IDEA, compensation, respect, and authority for K-12 interpreters remain inadequate.

Nearly 50% of surveyed K-12 interpreters cited barriers related to pay, lack of respect for their work, and uninformed supervisors or administrators. One respondent highlighted a "lack of understanding, respect, and support" for educational interpreting among school staff. Another mentioned "inconsistencies and lack of support from administration" and unreasonable expectations beyond their role.

Our survey reveals that the interpreter shortage uniquely affects K-12 interpreters. When schools lack staff, K-12 interpreters, often working solo, must fill coverage gaps instead of taking breaks or prep periods. The struggle to retain teachers in K-12 environments means working with staff lacking training on interpreters' roles and best practices.

According to the Arizona Department of Education Attrition Survey, the number of unfilled ASL interpreter positions in K-12 schools in 2023 was at its highest in five years.[48]

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[45] Witter-Merithew & Johnson (2004)
[46] Witter-Merithew & Johnson (2004)
[47] Witter-Merithew & Johnson (2004)
[48] AZ Dept. of Ed Teacher Attrition Survey (2023)

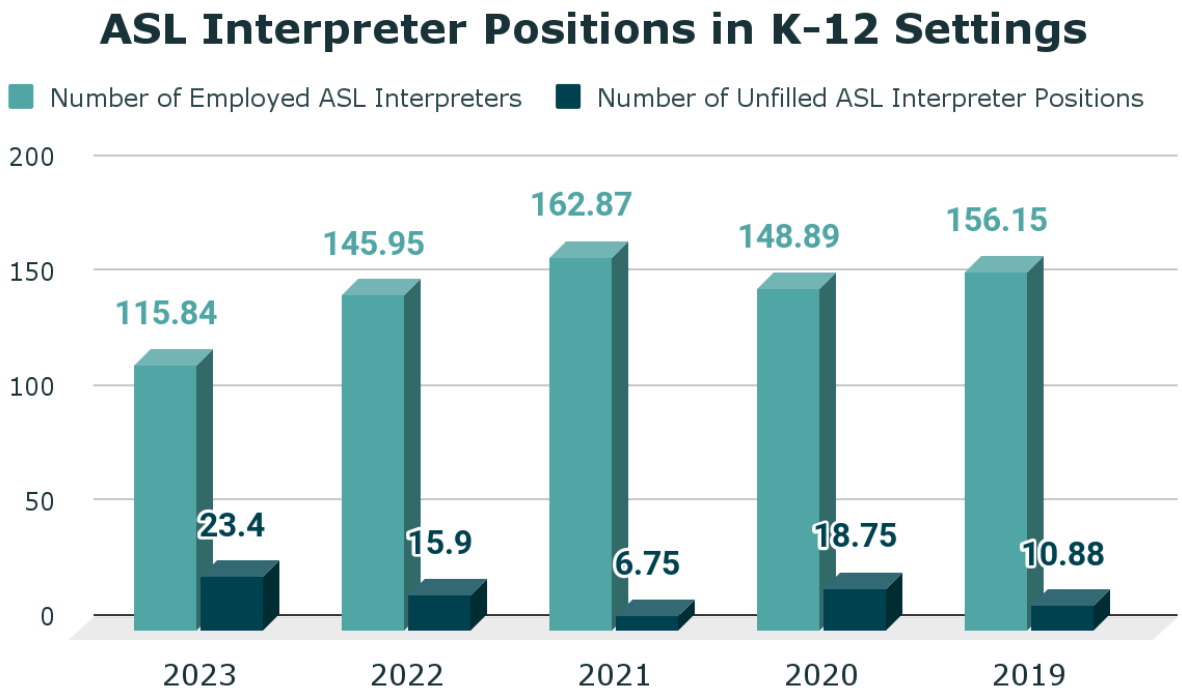

Figure 28: ASL Interpreter Positions in K-12 Settings[49]

Despite claims of a "well-regulated, interpreter-driven market," evidence suggests ASL interpreters have minimal influence over policies affecting their work. Administrations lag in recognizing the policy input of the K-12 interpreting community. Many districts are unclear about the training and skills needed for educational interpreters.[50] For instance, one Arizona district erroneously lists "certification in Braille" as a requirement for interpreters, despite multiple explanations that this is an unnecessary qualification, as the study is not DeafBlind. These frustrations often precede burnout and impact interpreter retention rates across various settings.

Trait 3: Credentials

Tseng's third trait, credentials, concerns meeting recognized standards from the profession, government, and society.[51] Witter-Merithew & Johnson found the field generally scored moderately in this area, except in K-12 settings due to inconsistent academic standards

[49] AZ Dept. of Ed Teacher Attrition Survey (2023)
[50] McCartney (2004)
[51] Witter-Merithew & Johnson (2004)

for interpreters. At the time, various testing systems were recognized regionally, but the RID national certification test was seen as the national standard. Results from our surveys focused heavily on two aspects of the credential trait - certification testing and state licensure.

Interpreter Testing

The rapid emergence of the ASL interpreting field without adequate infrastructure has made testing structures a challenge to grasp. Credentialing has struggled to develop valid testing mechanisms and keep pace with demand for years. RID's testing history has been marred by inconsistencies, with 20 different certifications introduced over time, causing significant disruption, especially with the 2015 moratorium on testing. Despite expectations of a one-year hiatus, various obstacles, including COVID-19, prolonged the moratorium for over six years. During this period, alternative tests like the BEI gained acceptance, providing stability amid the RID moratorium. ACDHH and other states opted to recognize these alternatives to mitigate the impact. Although the RID moratorium has been lifted for certain tests, ACDHH still accepts both testing systems for state licensure.

RID's latest census records 10,350 credentialed interpreters nationwide.[52] Those numbers do not take into account the areas of the country that use credentialing exams other than RID.

[52] RID Annual Report (2021)

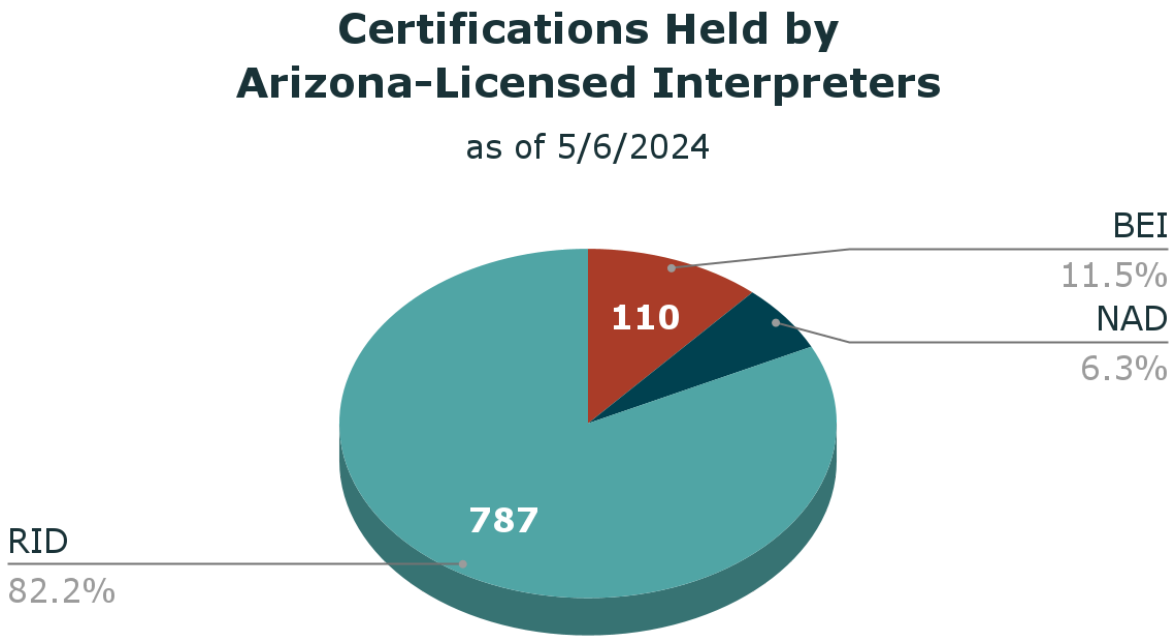

Figure 29: Certifications Held by Arizona-Licensed Interpreters

According to Witter-Merithew & Johnson, inconsistent minimum entry standards lead to instability and a lack of professional control over interpreting services.[53] ASL Agencies in the survey highlighted perceived differences in standards between RID and BEI Basic tests, despite both qualifying interpreters for an Arizona general license. Lack of shared testing metrics hinders direct comparison between the two tests. Nevertheless, it appears that future interpreters may prefer the BEI tests if current trends persist *(Figure 30)*.

[53] Witter-Merithew & Johnson (2004)

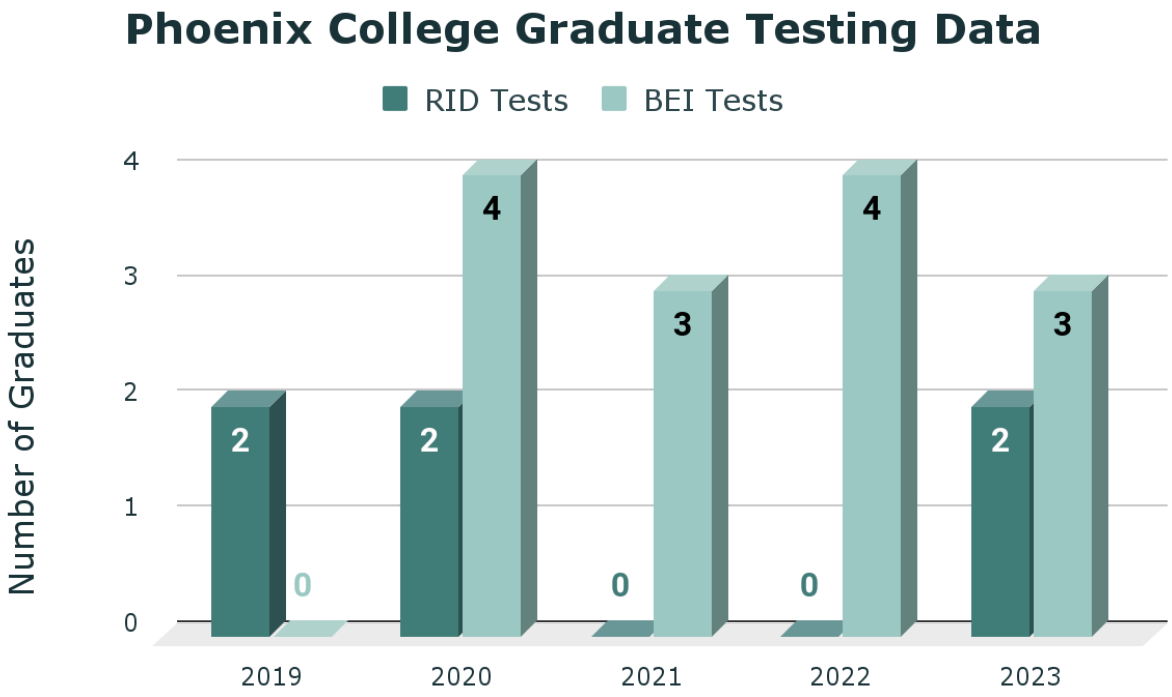

Figure 30: Phoenix College Graduate Testing Data

In our surveys, interpreter testing emerged as the most frequently cited factor contributing to the interpreter shortage. Out of 101 responses related to testing, the focus was largely on the cost, accessibility, response time of testing systems, and the effects of the RID testing moratorium.

Interpreter testing costs have been a point of contention in the ASL community *(see Appendix L for cost comparisons)*. While some argue that interpreting tests are cheaper than in other fields, concerns persist due to inconsistent entry requirements, unstable testing systems, doubts about reliability, and low pass rates. Many feel the tests lack value. Moreover, K-12 interpreters find the prices prohibitive given their salaries. RID tests are notably more expensive than BEI tests, but factoring in travel and lodging for BEI tests in Texas could make costs for these two tests comparable.

The interpreter shortage is also exacerbated by delays in receiving test results. Although BEI aims for a 90-day turnaround, during peak periods interpreters may wait up to six months or longer. RID performance test results, still in beta testing, take around nine months. CASLI, the organization administering RID's tests, anticipates completing beta testing soon, aiming for a 90-day result return thereafter.

As noted, interpreting test pass rates have been consistently low.[54] Some blame Interpreter Education Programs for not adequately preparing graduates to pass entry-level tests. However, these programs argue that interpreting skills cannot be effectively acquired in an Associate's or Bachelor's degree program alone. All parties agree that novice interpreters need more post-graduation skill-building, but meaningful experience opportunities are scarce.

2022 Pass Rates for Interpreter Exams						
	Test	**Year**	**Tests Administered**	**Tests Passed**	**Pass Rate**	**Required Waiting Period to Re-Test**
RID Tests	CGKE: Fundamental of Interpreting *(Part of the CASLI General Knowledge Exam)*	2022	662	389	59%	3 months
	CGKE: Case Studies - Ethical Decision *(Part of the CASLI General Knowledge Exam)*	2022	728	513	70%	3 months
	NIC Interview & Performance Exam	2022	629	267	42%	6 months
BEI Tests	Test of English Proficiency	2022	374	195	52%	6 months
	BEI Basic Performance Test	2022	174	75	43%	6 months

Figure 31: 2022 Pass Rates for Interpreter Exams

Novice interpreters face time constraints for passing certification tests. RID requires passing the performance test within five years of the General Knowledge Exam,[55] while Arizona Provisional licensure imposes a similar deadline for passing either performance test. This pressure is heightened by mandatory waiting periods after test failure. One respondent aptly summarized: "The timeframe between education, mentoring, testing, and job application can burden potential interpreters financially." Proctoring BEI tests in Arizona has been proposed, but

[54] CASLI Pass/Fail Rates; BEI Testing Pass-Fail Rates
[55] CASLI Testing Process Cycles

costs, including test licensing, rater training, and administration, are estimated at $14,000/year or more, potentially necessitating its own support department.

Arizona Licensure

Licensure is a significant aspect of Tseng's credentials category and heavily represented in our surveys. Licensing of ASL interpreters was mentioned 47 times in the surveys and the only topic discussed by every stakeholder group. Currently, 22 states license ASL interpreters, often in response to the vague definition of "qualified interpreters" in the Americans with Disabilities Act.[56]

Interpreters, both in-state and out-of-state, were queried about their current licensing status *(Figure 32)*. Those without an Arizona license are presumably K-12 educational interpreters. Intriguingly, none of the respondents from other states indicated holding a Legal-C, Legal-D, or Provisional B, C, or D license, which could point to an untapped market for greater virtual interpreting coverage.

[56] Institute for Justice (2022)

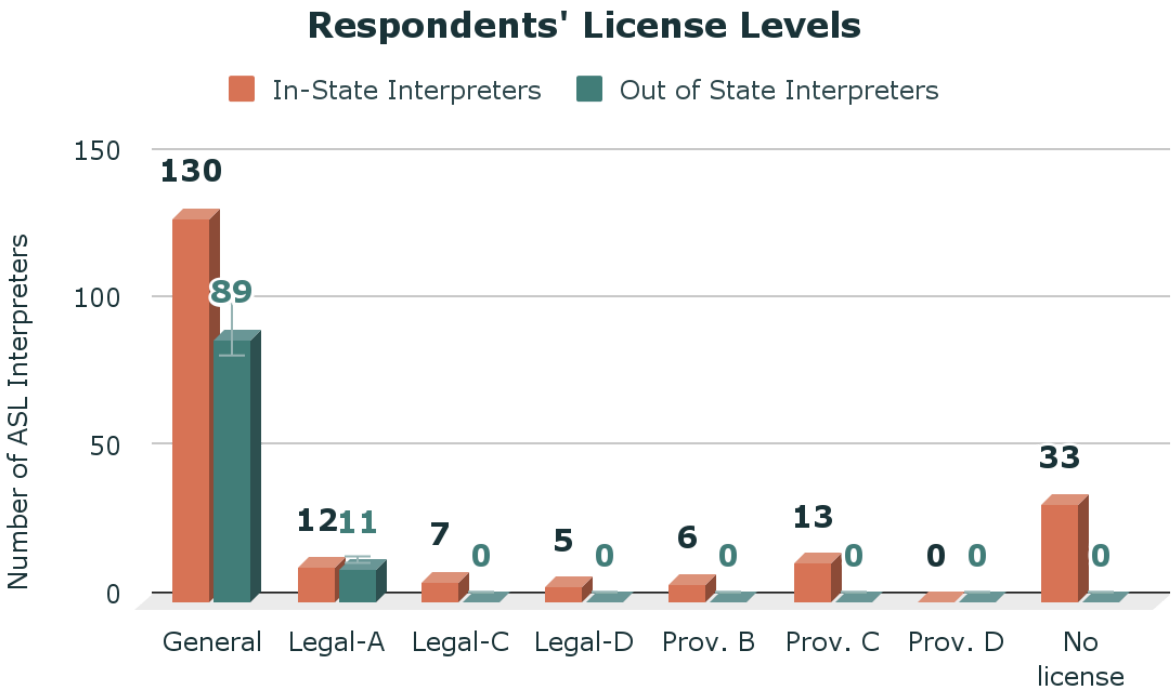

Figure 32: Interpreter Respondents' License Levels

Insights from various stakeholder groups shed light on the perceived impacts of licensure on the interpreter shortage. Interpreter Education Programs express a mix of support for higher standards and frustration with limited opportunities for graduates. Spoken Language Referral Agencies prioritize quantity over quality, advocating for the abolition of licensure to ensure prompt service for deaf consumers.

Burden Rank	Rank Change from 2017	Fees (Testing & Licensure)	Estimated Calendar Days Lost	Education	Experience	Exams
11	-9	$365	420	60 credit hours	None	2

Figure 33: Arizona's burden rank for ASL interpreter licensure[57]

Hiring Entities argue that licensure requirements, especially for Legal licenses, are overly challenging. However, according to the Institute for Justice, Arizona's interpreter license ranks 11th out of 22 in licensure burden rankings for low-income jobs.[58] Their analysis also shows the time investment needed for licensure for Arizona's general license requires 420 calendar days on average, compared to the national average of 626 days.[59]

To better grasp interpreters' perspectives on the licensure landscape, the survey inquired about the number of licenses interpreters held, other than Arizona. 44% reported holding two or more licenses. We also gathered opinions on the difficulty of licensure application and renewal processes.

[57] Institute for Justice (2022)
[58] Institute for Justice (2022)
[59] Institute for Justice (2022)

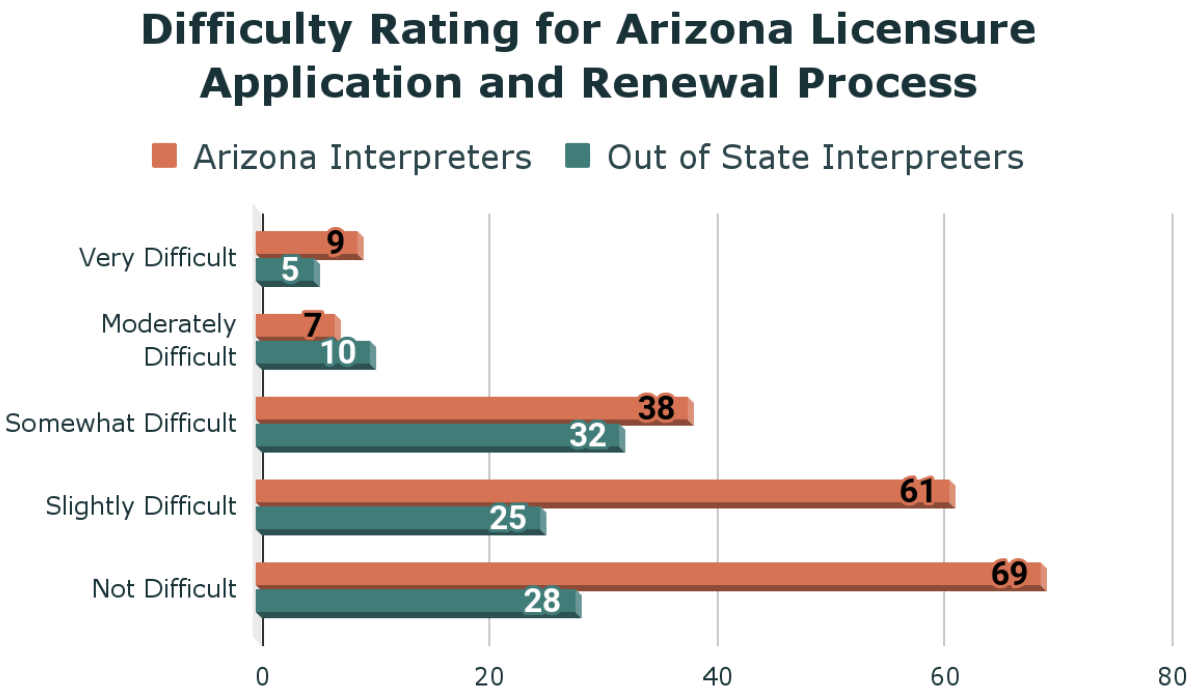

Figure 34: Difficulty Rating for Arizona Licensure Application and Renewal Process

Courts' experiences are significant, witnessing firsthand the impact of the interpreter shortage, particularly in high-risk legal scenarios. Obtaining a Legal license has become more challenging with the unexpected RID legal certification moratorium. Currently, the sole route for a Legal-A license is through BEI's Court Interpreter Credential (CIC). While a legal certification is already demanding, it is especially so for many RID-certified interpreters due to BEI's policies.

When RID switched its testing in 2005 to the National Interpreter Certification (NIC), it initially categorized interpreters into skill levels (General, Advanced, and Master). However, by 2011, this system proved ineffective, and the test shifted to a pass/fail approach. With the RID legal test on hold, many NIC-certified interpreters seek legal certification through BEI. However, BEI's eligibility criteria for the CIC require that interpreters with NIC certification hold either the Advanced or Master level, despite these distinctions not being available since 2011.

To qualify for the CIC, a NIC-certified interpreter would need to pass four exams: the Test of English Proficiency, BEI-Advanced Performance Test, Arizona Court Interpreter Credentialing

Program (ACICP) Written Exam, and the BEI CIC Performance Test. This process entails significant time, expense, and multiple trips to Texas.

Some Hiring Entities from the survey questioned the difficulty in finding Legal-licensed interpreters despite the apparent abundance on the ACDHH list, which currently reports 72 interpreters with Arizona Legal-A, Legal-C, or Legal-D licenses. Interpreters shed light by sharing the percentage of their work across various settings, including legal *(Figure 35)*. The graph below categorizes Arizona interpreters based on their employment status and also includes out-of-state interpreters providing services via VRI. Four of the respondents noted that when doing VRI work, they have no way to know where the deaf client is located.

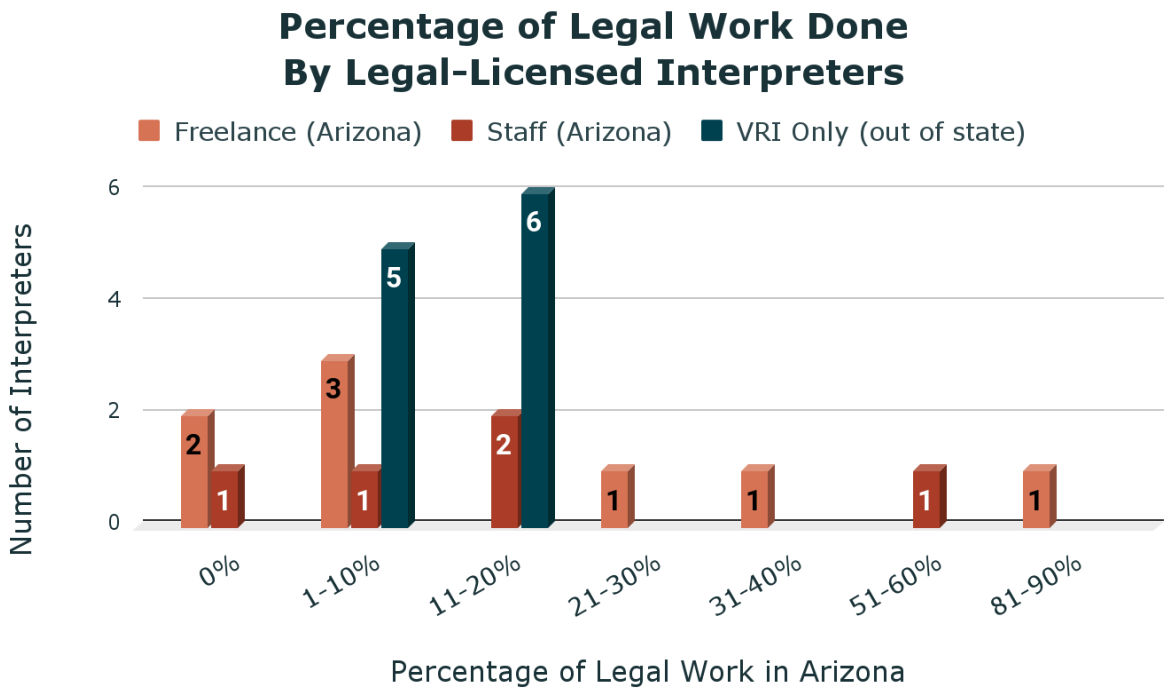

Figure 35: Percentage of Legal Work Done by Legal-Licensed Interpreters

We also surveyed out-of-state interpreters about their reasons for applying for an Arizona license *(Figure 36)*. Around 57% cited obtaining the license for VRI work, while 43% mentioned using it for isolated in-person assignments or other purposes. These findings underscore the fact that while Arizona boasts over 900 licensed interpreters, it doesn't necessarily reflect the true size of the available workforce.

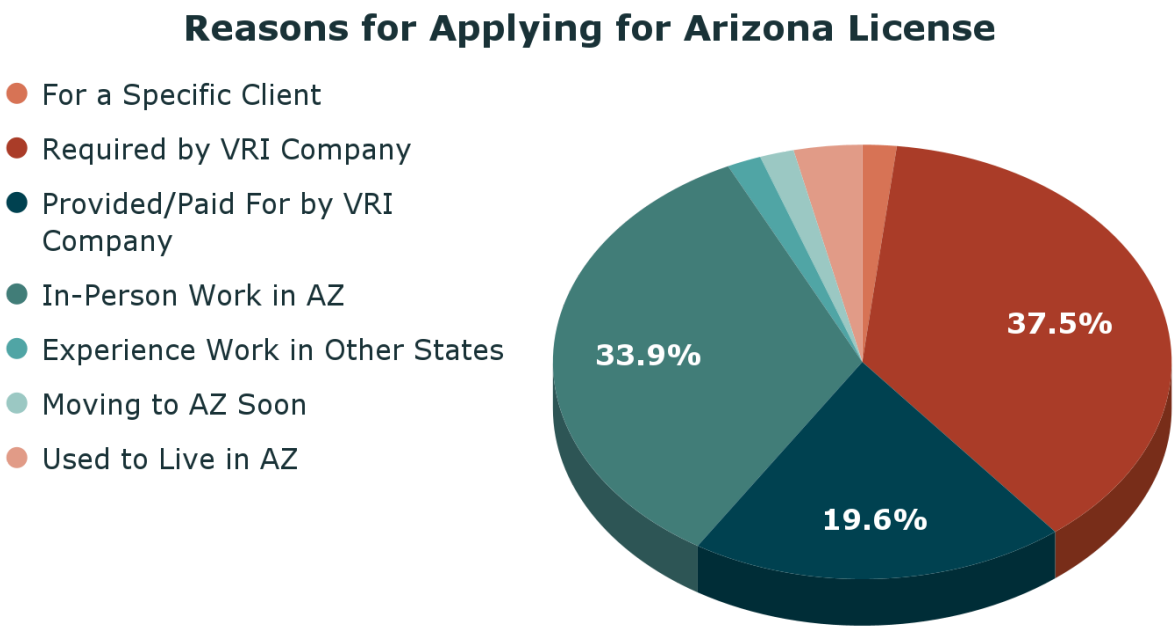

Figure 36: Reasons for Applying for an Arizona License

Licensure poses a challenge due to the limited availability of out-of-state VRI interpreters for deaf consumers in Arizona. Interpreter Referral Agencies note that in non-licensure states, requests for VRI appointments are almost always fulfilled, even with short notice. Several respondents propose licensure reciprocity as a solution. This proposition is complex and problematic, however, given the sheer number and variety of credentials held by working interpreters. When asked for a list of the credentials held, out-of-state interpreters reported 18 different credentials, from state-specific certifications and specialized certificates, to outdated national certifications. Establishing reciprocity between them all poses considerable challenges, underscoring the conflicts arising from the absence of standardized credentialing.

Hiring Entities and Interpreter Referral Agencies emphasized the limitations of licensure on the current workforce, while Interpreter Education Programs and Interpreters focused on the next generation of interpreters. Some respondents believe licensure creates barriers for new interpreters, hindering their skill development and integration into the profession. Others felt that

the waiting time mandated for Provisional C interpreters, who lack work opportunities, to transition to a Provisional B license, which offers more employment options, was stagnating new interpreters' skill growth and earning potential.

> Licensure funnels novice interpreters into K-12 environments which can negatively impact deaf children's education and language development, while stagnating interpreters' growth and causing burnout, potentially shortening interpreters' careers.
>
> - Survey Respondent

A thought-provoking survey comment highlighted unintended consequences of not licensing K-12 interpreters. It's common knowledge in interpreting communities that novice interpreters are often funneled into educational settings, despite research showing that deaf children are most benefited by highly-skilled, experienced interpreters that can act as language models. However, this system may impact the interpreter shortage, as well. The respondent noted that in isolating K-12 environments, novice interpreters rarely have exposure to other interpreters or deaf language models, hindering their skill development. This potentially stagnates interpreters' growth, whether their goal is to improve as a K-12 interpreter or transition to adult services. Additionally, the demanding nature of educational interpreting, with long hours and few breaks, increases risk of injury and burnout, potentially shortening interpreters' careers. The respondent questioned how many highly skilled interpreters have been lost due to this flawed system.

Although Arizona licensure maintains high standards for ASL interpreting services, it also contributes to a shortage of practitioners."While most will argue that these standards are sorely needed, the more constraints placed upon the requirements to interpret, the greater the demand upon the profession to relieve subsequent shortages."[60]

Trait 4: Induction

Induction is the process of fostering novice professionals and supporting their development toward practitioners.[61] Since research suggests that it could take nine years or

[60] Swartz, p. 12 (2008)
[61] Witter-Merithew & Johnson (2004)

more to “grow” an ASL interpreter,[62] the induction process begins during the Interpreter Education Program and is expected to continue after graduation through mentorship, supervision, and direct guidance.

The ASL interpreting field has long grappled with the "Graduation-to-Certification Gap", contributing to the interpreter shortage. Researchers note that the absence of a robust induction process undermines the significance of interpreters' work and marginalizes the field.[63] Nearly all stakeholder groups highlighted the lack of postgraduate training and mentoring, making it the second most-discussed issue after testing.

Interpreter Education Program graduates face complex decisions upon graduation. They must choose which certification test to take, decide whether to apply for a Provisional license, and assess their readiness to pass a performance test within the five-year limit. Most crucially, they must determine their career path to earn a living.

> A key to addressing the shortage is to find a way for novice interpreters to sustain themselves financially during the induction period.

For those interested in K-12 interpreting, transitioning is somewhat simpler as job opportunities are often available. Even those who don't meet the Department of Education's recommended score on the Educational Interpreter Performance Assessment (EIPA) may still receive job offers. However, some graduates prefer not to work with children due to the concerns discussed in the previous section.

Those opting out of K-12 interpreting must pass the written exam for either RID or BEI certification to qualify for a Provisional C license, allowing them to earn income, but only under supervision. However, job opportunities for Provisional C interpreters are predominantly substitute positions in K-12 schools, once again limiting opportunities for skill development. If they cannot financially sustain themselves with a Provisional C license, they often need to find another job, further impeding their progress toward passing the performance certification test before their license expires.

Many survey respondents stressed the importance of addressing the Graduation-to-Certification gap as a key solution to the shortage. They emphasized the

[62] Jacobowitz (2005)
[63] Witter-Merithew & Johnson (2004)

necessity for novice interpreters to sustain themselves financially during this induction period to prevent burnout and dissatisfaction.[64] Additionally, several respondents noted Arizona's loss of interpreters to states with fewer restrictions and higher pay for uncredentialed interpreters.

The intent of the Provisional licenses was to provide novice interpreters with a paid induction period to avoid impacting interpreter numbers. However, Interpreter Referral Agencies, responsible for coordinating most interpreting work in Arizona, faced challenges honoring contracts guaranteeing the skill level of certified interpreters. One Referral Agency emphasized their support for a structured induction program but clarified that their business couldn't serve as a training ground, stating, "We provide a professional service and won't compromise on interpreter quality due to lack of experience, skills, or credentials." Another agency attempted to negotiate terms for Provisional interpreters in client contracts but lost the bid as a result.

Stakeholders unanimously acknowledge the imperative for action, whether it involves adapting licensure laws to fit the current system or adjusting the system to comply with licensure laws. The consensus is clear: a systemic approach to induction is a necessary component in addressing the shortage of interpreters.

Trait 5: Code of Ethics

Twenty years ago when Witter-Merithew & Johnson published their study on market disorder, they found the ASL interpreting field scored high for Code of Ethics due to the recognized Code of Professional Conduct from RID. However, they noted the difficulty with enforcing the code without a mechanism for holding non-credentialed, unqualified interpreters accountable.

This is an issue exasperated by the limitations of our licensure law, as well. Although survey responses didn't directly address enforcement against uncredentialed interpreters, some comments highlighted the need for Interpreter Referral Agency accountability. According to Witter-Merithew & Johnson, the lack of accountability for bad actors in the field, paired with the low scores of other traits, like collective authority, credentials, and systematic theory, "impact the potential contribution of the ethical standards trait to the overall professionalization process."[65]

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[64] Swartz (2008)
[65] Witter-Merithew & Johnson p.14 (2004)

Trait 6: Compensation

Compensation in a given field typically aligns with its complexity and required skill level, a critical factor in both attracting and retaining workers. For interpreters, this aspect is further shaped by market standards, the perceived value of their work, and their limited influence over market norms[66]

According to Witter-Merithew & Johnson, compensation for ASL interpreters falls within a moderate range, with a significant variance in pay expectations, some of which are insufficient to attract qualified professionals.[67] This sentiment was echoed by survey respondents, with a total of 69 comments highlighting interpreter pay as a central issue contributing to the shortage.

To examine freelance interpreters' current pay, national survey results were compared with reports from Arizona freelance interpreters *(Figure 37)*.

[66] Witter-Merithew & Johnson (2004)
[67] Witter-Merithew & Johnson (2004)

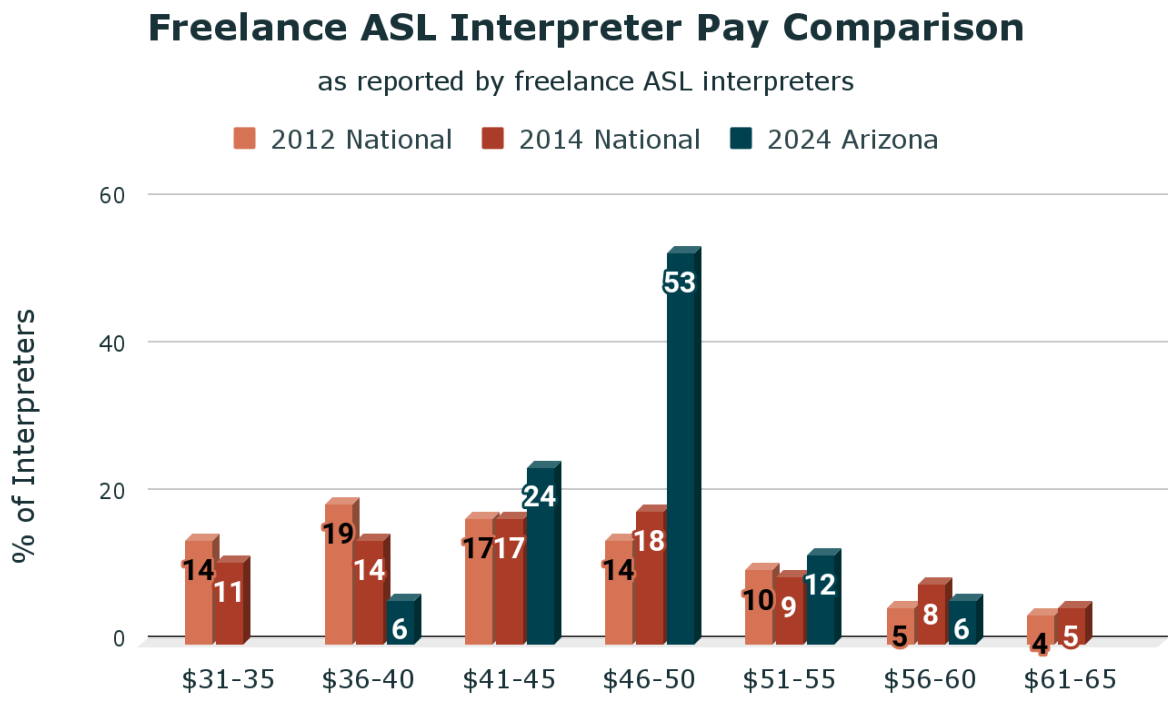

Figure 37: Freelance Interpreter Pay (2012-2023)[68]

ASL and Spoken Language Referral Agencies were queried about their compensation rates for Arizona interpreters, both in legal and non-legal settings *(Figure 38)*. The graph below illustrates the upper limits of pay for each license category, along with the average compensation provided by ASL and Spoken Language Referral Agencies participating in the survey. It's worth noting that respondents from Spoken Language Referral Agencies had no experience working with Provisional interpreters and thus lacked data for that category.

[68] Monahan, 2023

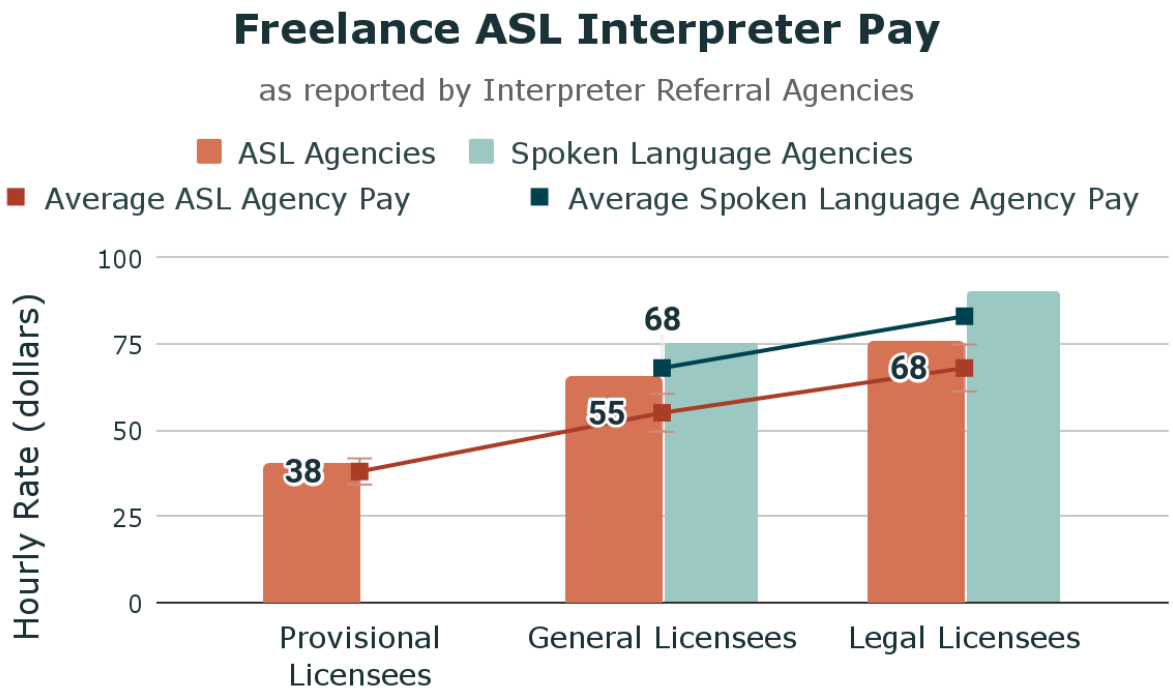

Figure 38: Freelance Interpreter Pay as Reported by Interpreter Referral Agencies

While comparing national historical data with current Arizona-specific data presents challenges, the findings indicate that 35% of interpreters are now earning 11% more than they were a decade ago, assuming the national data reflects the pay trends for Arizona interpreters over the same period. Over that timeframe, inflation has risen by 33%[69], and Arizona home prices have surged by 129%.[70]

For insights into ASL interpreter service costs, the chart below illustrates rates paid by Hiring Entities to Interpreter Referral Agencies *(Figure 39)*. These rates are contrasted with those from a 2013 national survey.[71] If national survey rates reflect those of Interpreter Referral Agencies, it suggests Referral Agencies have raised rates by 50% or more, while interpreters saw wage increases of 10-20%.

[69] U.S. Bureau of Labor Statistics
[70] Metro Phoenix Homes
[71] NIEC Report on Referral Agencies Needs Assessment (2013)

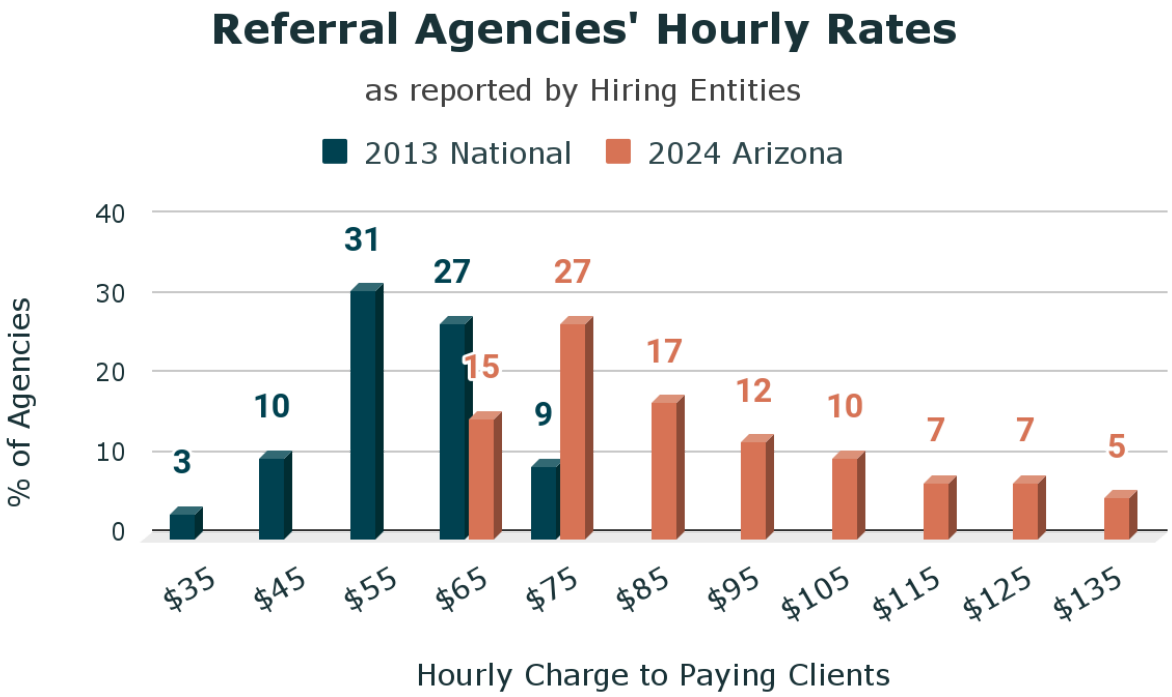

Figure 39: Referral Agencies' Hourly Rates

The survey also gathered hourly wage data for General and Legal licensees holding full-time staff positions *(Figure 40)*. Interpreter staff positions may encompass roles in the VRS/VRI industry, K-12 education, or the public and private sectors. While these hourly rates are much lower than freelance interpreter rates, most staff positions come with additional benefits, like health insurance and paid professional development.

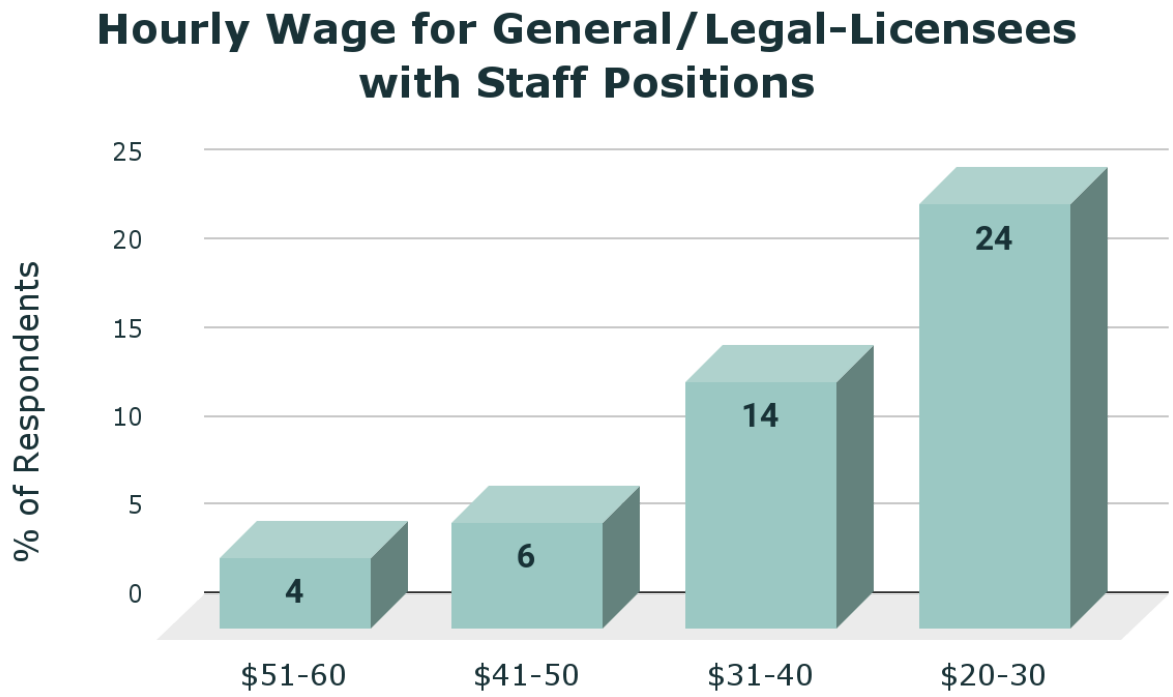

Figure 40: Hourly Wage for General/Legal-Licensees with Staff Positions

Finally, Figure 41 shows 2023 survey data which reveals the average pay for K-12 interpreters in Arizona. According to the Louisiana Commission for the Deaf Needs Assessment Report, the national average salary for K-12 interpreters is $35,000.[72] This figure hovers near the poverty threshold for a family of four and falls significantly below the income level typically associated with middle-class status in Arizona. Additionally, K-12 staff positions are sometimes not offered benefits due to their paraprofessional status.

[72] Louisiana Interpreter Needs Assessment (2023)

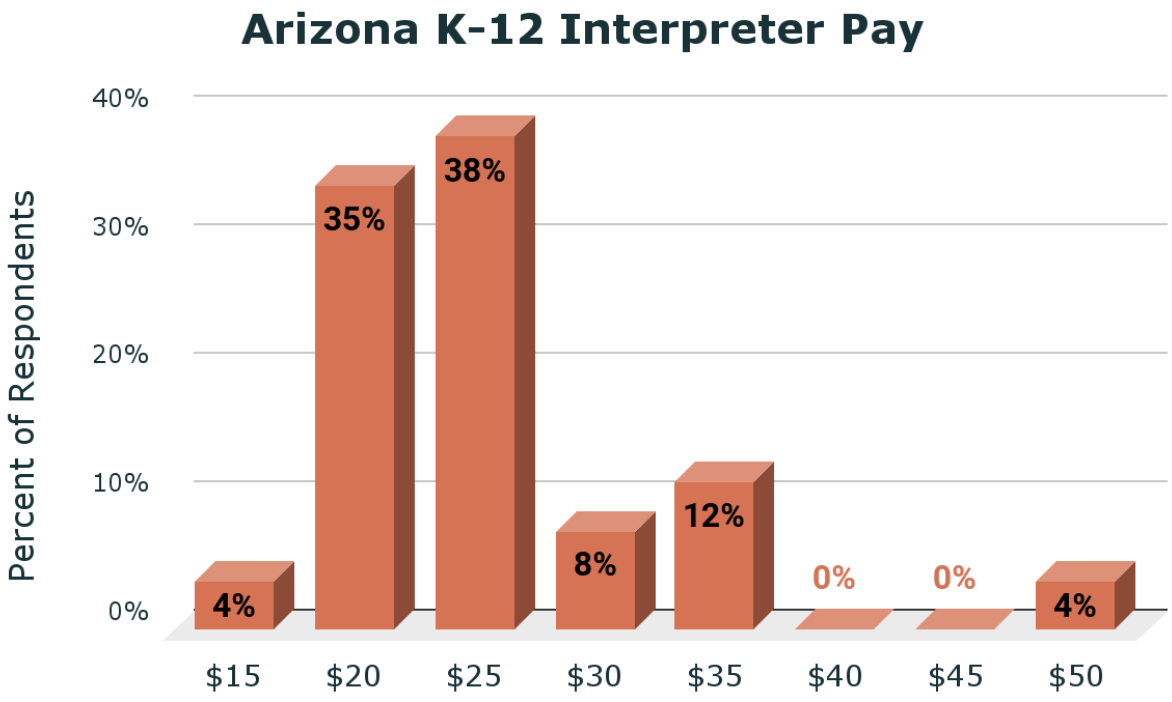

Figure 41: Arizona K-12 Interpreter Pay[73]

ASL interpreters aren't the sole stakeholders facing this pressure. One ASL Referral Agency disclosed that their business struggles to generate profits because they prioritize passing on the maximum amount of money to interpreters, leaving minimal funds for overhead expenses. Attempts to raise rates often result in strong objections from Hiring Entities, prompting office staff to allocate resources towards lengthy phone conversations defending interpreters' professionalism and justifying interpreting costs. Ultimately, increasing rates leads many Hiring Entities to seek cheaper alternatives, often from larger companies that lack direct contracts with ASL interpreters. Consequently, it's the Deaf consumers who suffer, as these businesses frequently cite the "unavailability of interpreters" rather than acknowledging their lack of service providers.

Interpreters expressed disillusionment with the field, noting that achievements such as advanced degrees, additional certifications, and years of experience failed to yield significant pay increases. Many interpreters remarked that any wage hikes they received didn't keep pace with annual cost-of-living adjustments. As Schwartz (2008) stated, despite the extensive time

[73] Monahan (2022)

required to develop skills and the demanding nature of the work, ASL interpreting is often under-valued in the same way as other female-dominated social service professions.[74] Interpreter pay is widely cited as a primary factor contributing to the shortage, with researchers concurring that studying interpreter compensation is crucial for addressing the issue.[75]

Trait 7: Continuing Professional Development

This trait refers to the system in which members of a profession are expected to continue building knowledge and application of best practices for their field.[76] Merithew & Johnson assigned a high rating to this trait for ASL interpreting, largely attributed to RID's Certification Management Program and the diverse range of Continuing Education Units (CEUs) available to interpreters.[77]

While survey results did not yield many comments highlighting CEUs as a factor contributing to the interpreter shortage, respondents from certain courts did express the need for more specialized training to support interpreters seeking legal certification. Additionally, one interpreter voiced frustrations regarding the lack of organization surrounding CEUs. Both of these issues will be further explored and addressed in the Solutions section of this report.

Trait 8: Community Sanctions

The trait of community sanctions focuses on the public recognition of a field as a legitimate, respected profession. In their study, Witter-Merithew & Johnson reported ASL interpreting scored low for this trait due to the limited understanding society has about the field, despite there being legal mandates in place for interpreting services.

Survey responses show interpreters express a profound sense of being misunderstood and undervalued. They feel let down by the systems they once relied on for support, particularly with RID due to concerns over testing procedures and lack of organizational transparency. They are spending extra time and energy vetting unfamiliar Referral Agencies and advocating for the profession to those who put profit over integrity. Hearing consumers, who largely admit to being unfamiliar with the standards necessary for effective communication, are given roles of authority

[74] Swartz (2008)
[75] McCartney (2004)
[76] Witter-Merithew & Johnson (2004)
[77] Witter-Merithew & Johnson (2004)

as supervisors and policy-makers, making decisions on micro and macro levels that affect interpreters' work without respecting deaf perspectives or interpreters' professional input.[78]

The collective disillusionment expressed in the survey is causing burnout of ASL interpreters on a large scale. Researchers in the interpreting field cite professional burnout can be a result of:

- Poor working conditions
- Unrealistic performance expectations
- Role conflicts
- Heavy workloads
- Lack of support
- Emotional stress
- Exposure to sensitive information
- Inability to help clients with their problems
- Low pay
- Lack of consumer education about deafness and interpreting
- Lack of respect or appreciation[79]

The term "burnout" surfaced 35 times in survey responses, alongside mentions of vicarious trauma and microaggressions. Studies suggest that ASL interpreters may be particularly vulnerable to this type of burnout due to the insidious and cumulative nature of seemingly minor instances of oppression.[80] Interpreters not only witness oppression but also facilitate its delivery, adding to the strain.

For ASL interpreters, burnout isn't just psychological, it can also be physical. In the first two years of working in the field, one out of four interpreters will have already experienced some type of repetitive motion injury.[81] One survey respondent wrote "I often wonder if my body will last until retirement with the hours I have to put in just to be able to pay my bills." Figure 42 shows the number of hours ASL interpreters reported working on a weekly basis. It should be noted that 30-35 hours a week of interpreting is generally accepted as full-time, due to the physical and cognitive demands of the work.

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[78] Louisiana Interpreter Needs Assessment (2023)
[79] McCartney (2004); Swabey & Mickelson (2008)
[80] Humphrey (2015)
[81] Nimdzi (2021)

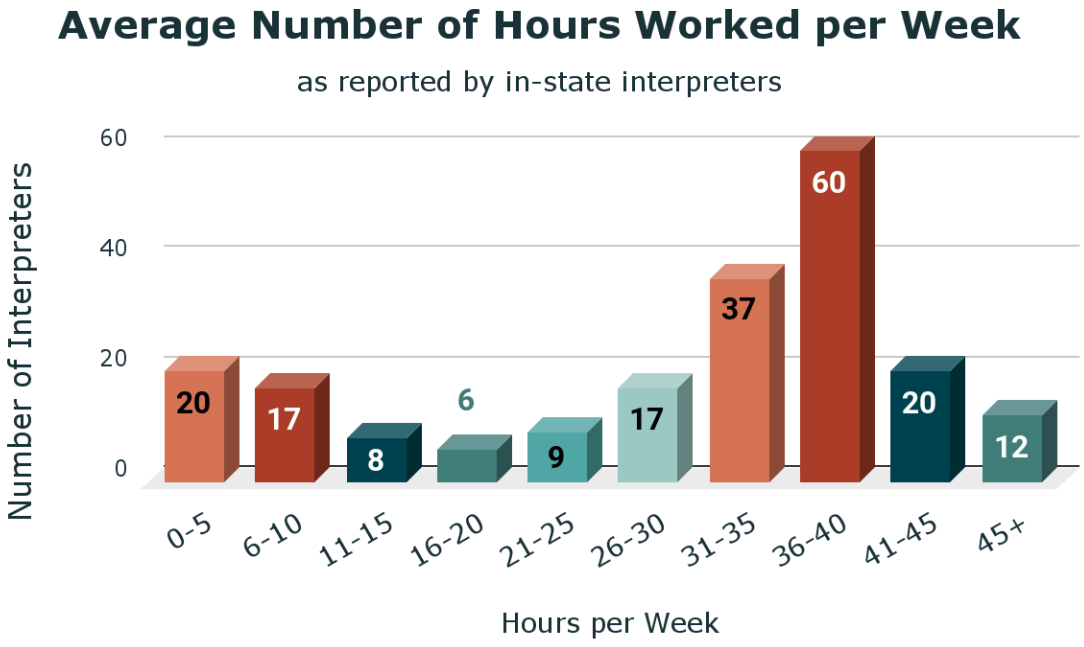

Figure 42: Average Number of Hours Worked per Week by Arizona Interpreters

With these challenges, it's not surprising that a fair number of survey respondents suggested that some of the shortage may be caused by interpreters leaving the field for other types of work.

Trait 9: Culture

The final aspect to consider is culture, reflecting the sense of community within the profession. Initially, Witter-Merithew & Johnson rated the interpreting field positively due to RID's robust network spanning national, state, and local levels. Unfortunately, some interpreters may argue that this assessment no longer holds true. RID's reputation has declined among practitioners, which was mentioned by several survey respondents. As an example, of the 54 local RID chapters, which RID considers "the backbone of (their) organization", only 16 meet RID's criteria to be labeled "healthy", including demonstrating a stable or increasing membership of 50 or more members.[82]

[82] RID Affiliate Chapters (2024); Grieser & Ball (2023)

Many survey respondents cited other challenges within ASL interpreting culture. Horizontal violence, the subtle or overt act of bullying, hazing, insulting, or ridiculing one's co-workers, was a recurring theme in survey responses, particularly regarding interactions with emerging professionals.[83] Survey respondents cited the “eat your young” mentality that “discourages new interpreters and makes it difficult to develop healthy working relationships.” Another respondent referenced the professional culture as one of “interpreters tearing each other down, back biting, (and) undermining” eachother. Efforts to address this pattern are evident across the field in workshops, published papers, and teaching methods in Interpreter Education Programs.

Another significant cultural shift is attrition. Concerns have long existed regarding whether incoming ASL interpreters will adequately replenish those leaving the field. In the 2012 national survey, only 18% of respondents were under 30 years old.[84] By 2014, this figure dropped to 14%.[85] However, in our recent survey, over 50% of respondents indicated they had been working in the interpreting field for 20 years or less.

[83] Hill (2018)

[84] NIEC Report on the National Needs Assessment Initiative (2016)

[85] NIEC Report on the National Needs Assessment Initiative (2016)

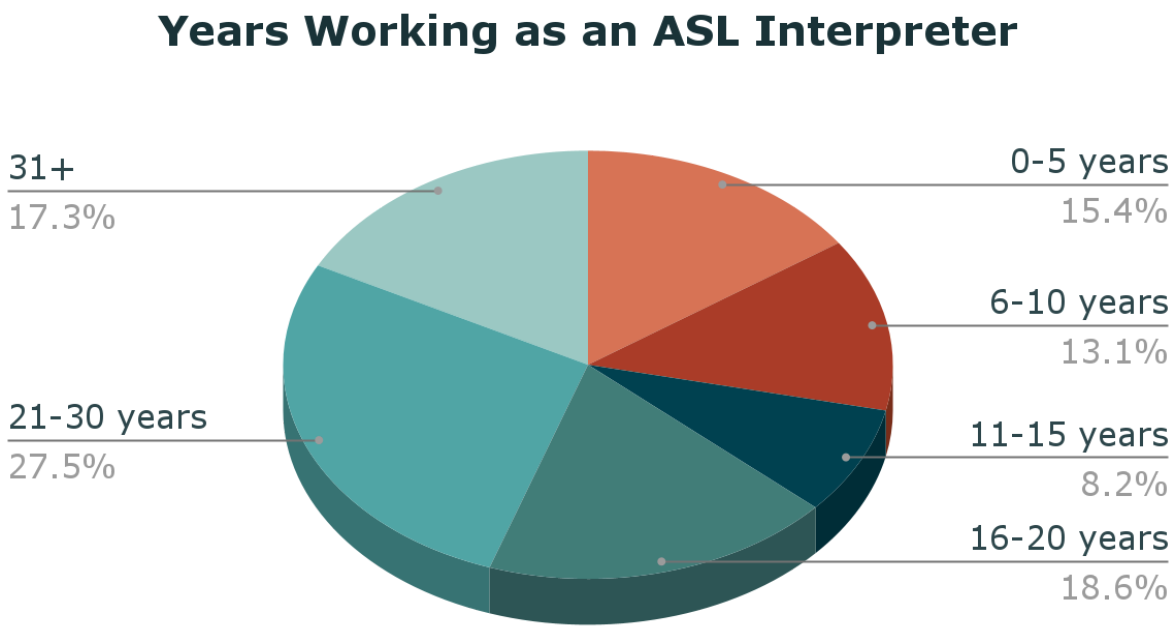

Figure 43: Number of Years Interpreters Have Been Working as an Interpreter

Proposed Solutions

It's been 20 years since Witter-Merithew & Johnson researched market disorders within the ASL interpreting field. The field has changed drastically since their study was published, yet many themes remain the same. This section will outline the proposed solutions offered by survey respondents as well as some action already initiated by ACDHH.

Interpreter Training	Mentorship program that pays mentors and novice interpreters
	Offer more test prep and advanced training workshops
	Raise qualifications for high school ASL teachers
Testing	Offer scholarships/grants for interpreter testing and travel costs
	Increase the availability of the NIC and EIPA in Arizona
Policies/ Regulations	Establish policies to hold VRS, VRI, and Interpreter Referral Agencies accountable for their business practices
	Unionize ASL interpreters
Recruitment	Do a PR campaign to educate the public about becoming an interpreter
	Partner with ASL teachers to identify future interpreters
Licensure	Establish reciprocity with other states' credentials
	Grant extensions for Provisional interpreters
	Change requirements for the Legal License to a portfolio system
	Make the transition to Provisional B more accessible
	Recruit out-of-state interpreters who can qualify for the Legal C, Legal D, or Provisional licenses
Exposure	Educate students in high schools and colleges so they're aware of

	inclusion and communication access

Collaborations	Encourage stakeholder groups to learn more about each others' perspectives; reduce the silos between stakeholders
	Provide businesses needing interpreting services the opportunity to invest in solutions

Figure 44: Survey Respondents' Proposed Solutions

Some of the proposed solutions submitted by respondents fall outside the purview of ACDHH's authority, such as modifying testing protocols or altering mandatory waiting periods post-test failure. However, among the suggestions that ACDHH can endorse, several initiatives are already underway. For instance, ACDHH is actively developing a robust mentorship program, identified as the top recommendation by survey respondents. Additionally, ACDHH has established a repository of categorized on-demand webinars and a centralized workshop calendar, aggregating events from across the nation in an organized, searchable format. Furthermore, ACDHH has been proactively engaging with high school ASL classes, delivering recruitment presentations to their students.

Many of these solutions are long-term approaches, which may offer little comfort to deaf consumers, ASL interpreters, Hiring Entities, and Interpreter Referral Agencies seeking more immediate resolutions. Stakeholders seeking interim measures can turn to Appendix M for recommendations on mitigating the ASL interpreter shortage until systemic solutions are implemented. Moreover, for a comprehensive analysis of systemic requirements, numerous states conducting analogous studies have enlisted the expertise of strategy consultants. Notably, firms like Innivee Strategies, a consulting firm owned and operated by Deaf individuals, have been instrumental in this regard.

ACDHH has the opportunity to address these issues at a systemic policy level. According to Witter-Merithew & Johnson, “during these periods of market disorder, market participants look to government regulators to establish public policies and regulatory structures that will mitigate the negative effects of market disorder. Without such policies and structures,

market disorder can lead to market disaster."[86] It is evident that any solutions will need to be a collaborative effort with all stakeholders involved.

[86] Witter-Merithew & Johnson p.2 (2004)

Conclusion

The Board of Commissioners at the Arizona Commission for the Deaf and the Hard of Hearing identified a significant shortage of qualified ASL interpreters in Arizona, affecting the deaf community's access to essential services. To investigate the underlying causes, ACDHH consulted five key stakeholder groups: Interpreter Education Programs, ASL Referral Agencies, Spoken Language Referral Agencies, Hiring Entities, and ASL Interpreters.

Despite Arizona's robust educational opportunities, Interpreter Education Programs face challenges such as declining enrollment post-COVID and difficulties in producing interpreters meeting certification standards. Smaller, local ASL-focused Interpreter Referral Agencies emerge as primary providers of interpreting services, yet there's been a marked increase in Spoken Language Referral Agencies marketing ASL interpreting services, often without understanding the unique differences between signed and spoken languages. This reliance on such agencies by Hiring Entities leads to issues like uncertainty about interpreters' credentials and a lack of control over specific requests, sidelining deaf consumers in the process. Currently, there are no mechanisms in place to hold Interpreter Referral Agencies accountable, necessitating further investigation into their practices' impact on the Deaf community, Hiring Entities, and ASL interpreters.

Interpreters themselves point out numerous factors that exacerbate the shortage, such as insufficient pay, frequent burnout, and inadequate support after graduation. Additionally, interpreters often struggle with the expenses and intricacies associated with certification and licensure processes. Furthermore, the growing dependence on Video Remote Interpreting (VRI) and Video Relay Service (VRS) has further diminished the availability of interpreters for in-person assignments.

The shortage of ASL interpreters in Arizona is attributed to several factors:

1. **Systemic Theory:** Inconsistent education standards and the impact of COVID-19 on skill levels have created a gap between training and professional readiness.

2. **Authority:** The field lacks collective influence over policy-making and working conditions, particularly in VRS/VRI industries and K-12 educational settings.

3. **Credentials:** High costs, low pass rates, and prolonged testing processes hinder new interpreters from entering the field.

4. **Induction:** The gap between graduation and certification leaves novice interpreters without adequate support and mentorship.

5. **Compensation:** Interpreters are underpaid, leading to high attrition rates and difficulty in retaining professionals.

6. **Community Sanctions:** The public and hiring entities often undervalue the profession, contributing to burnout and dissatisfaction among interpreters.

Survey respondents and stakeholders suggest several solutions to address the shortage:

1. **Enhanced Mentorship:** Developing robust mentorship programs to support novice interpreters.

2. **Improved Testing Accessibility:** Offering scholarships, reducing costs, and increasing the availability of certification tests.

3. **Policy Changes:** Establishing accountability for VRS/VRI companies and Interpreter Referral Agencies, and advocating for unionization.

4. **Recruitment Campaigns:** Educating the public about the interpreting profession and partnering with ASL teachers to identify future interpreters.

5. **Licensure Adjustments:** Establishing reciprocity with other states, granting extensions for provisional licenses, and modifying legal license requirements.

6. **Support for Continuing Education:** Providing more specialized training and organized Continuing Education Units (CEUs).

ACDHH acknowledges the intricate nature of the ASL interpreter shortage and emphasizes the necessity of a comprehensive approach to address these issues. While ACDHH has taken measures to provide support to interpreters in multiple ways, urgent actions and enduring strategies are essential to guaranteeing that the deaf community in Arizona can

access proficient interpreting services. Collaboration among all stakeholders is vital to formulate lasting solutions that will bolster the professionalization of ASL interpreters across the state.

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Appendices

Appendix A:
News Stories About the Interpreter Shortage

	STATE	YEAR	COUNTRY
Arizona is dealing with a sign language interpreter shortage	AZ	2024	
Deaf Students Protest Interpreter Shortage	CA	1999	
ASL interpreter shortage strains NCOD	CA	2022	
Lack of ASL Interpreter Causes Challenges for FCC Faculty Who Are Deaf	CA	2023	
For deaf patients in Connecticut, interpreter shortage challenges appropriate medical care; 'it's a universal issue'	CN	2022	
Interpreter shortage challenges appropriate medical care for deaf patients	CN	2022	
Program Addresses Shortage of Certified ASL Interpreters in Rural Colorado	CO	2019	
At Colleges, Lack of Interpreters for Deaf	DC/MD/VA	1999	
Shortage of sign language interpreters	FL	2020	
Lee County legal system faces interpreter shortage	FL	2024	
Hawaii's Deaf Community Is Struggling With Lack Of Certified ASL Interpreters	HI	2024	
Here's how the ASL interpreter shortage is affecting Iowans	IA	2022	
Lack of ASL interpreters hurting Iowa's deaf, hard of hearing communities	IA	2022	
Deaf people are people' The changes Idaho is making for a higher standard of interpreters	ID	2019	
Extreme shortage of sign language interpreters	LA	2017	
Shortage of sign language interpreters	MI	2015	
Continued shortage of ASL interpreters causes strain as need increases	MI	2020	
GRCC working to address ASL interpreter shortage	MI	2022	
Nearly half of Minnesota American Sign Language interpreters are expected to leave their profession by 2026	MN	2023	
Statewide ASL interpreter shortage	MN	2023	
It's a very real struggle': Deaf community faces interpreter shortage in health care	NE	2024	

“Your Request Cannot be Filled"	NH	2023	
Nevada State College Deaf studies students hope to address state's interpreter shortage	NV	2017	
Deaf studies program at Nevada State opens lines of communication in community	NV	2023	
Deaf Students Face Lack of Interpreters	NY	1997	
Judge Spotlights Shortage of Interpreters for the Deaf	NY	2007	
Shortage of Sign Language Interpreters in City Courts Creates Delays	NY	2019	
SHORTAGE OF SIGN LANGUAGE INTERPRETERS IN CITY COURTS CREATES DELAYS	NY	2019	
Lack of Interpreters Cause Fear and Confusion Among the Deaf	NY	2020	
Salem Health struggles with ASL interpreter shortage	OR	2015	
Want to learn a new language? Try ASL and combat interpreter shortages	PA	2024	
Deaf patients struggle with interpreter shortage	SC	2019	
HELPING HANDS: Deaf community says interpreter shortage is problem in Lubbock	TX	2019	
Critical shortage of ASL interpreters leaves East Texas Deaf community in need of hearing services	TX	2022	
Why is there a shortage of Sign interpreters?		2018	UK
Deaf community facing interpreter shortage (Australian YouTube video)		2022	Australia
Shortage of interpreters and training for teachers failing deaf and hard of hearing students		2022	Australia
COD NL, Association of the Deaf Rallying Over Shortage of ASL Interpreters		2023	Canada
N.L. has 5 ASL interpreters. This deaf advocate says that's hampering seniors' access to services		2023	Canada
Report: drastic interpreter shortage stymies legislation		2023	Ireland
Deaf academics say a lack of ASL interpreters specialized in STEM is holding them back		2024	Canada

Appendix B:
ASL Agency Survey Questions

1. What types of services does your company offer for ASL Interpretation? (choose all that apply)
    a. On-Site Interpreting
    b. Scheduled VRI Interpreting
    c. On-Demand VRI Interpreting
    d. Other…

2. What geographic areas do you provide ASL Interpreting services in? (choose all that apply)
    a. All over Arizona
    b. Phoenix Metro
    c. Tucson/Southern Arizona
    d. Flagstaff/Northern Arizona
    e. Yuma/Southwestern Arizona
    f. Lake Havasu/Northwestern Arizona
    g. Other…

3. Approximately how many clients/businesses in Arizona have utilized your ASL Interpreting services within the past year?
    a. 0-5
    b. 6-10
    c. 11-15
    d. 16-20
    e. 21-25
    f. 25+
    g. Other…

4. Approximately how many requests does your company receive for ASL interpreting in Arizona each month?
    a. 0-10
    b. 11-25
    c. 26-50
    d. 50-100

e. 100+
f. Other…

5. Approximately how many of those requests go unfilled each month?

6. How difficult is it for your company to find interpreters for the following types of assignments in Arizona? (Very Difficult, Somewhat Difficult, Not Difficult, No Experience, Unsure)

    a. Last-minute requests (less than 72-hour notice)
    b. Requests more than 30 miles from the interpreters' home
    c. Assignments over 5 hours
    d. Requests for a Certified Deaf Interpreters
    e. Request for Tactile/Protactile Interpreters
    f. Requests after normal business hours

7. Are there any other types of assignments in Arizona that are a challenge to fill?
8. Of the assignments that go unfilled, what is the percentage of VRI assignments compared to in-person assignments?
9. How many Arizona interpreters do you currently have on your roster with RID or BEI certification?

    a. 0-10
    b. 11-20
    c. 21-30
    d. 31-40
    e. 41-50
    f. 50+
    g. Other…

10. How many interpreters on your roster have the following licenses? *(NOTE: Arizona interpreter licenses are granted by the Arizona Commission for the Deaf and the Hard of*

Hearing and is a separate credential from certification.)
License Options: General, Legal A, Legal C, Legal D, Provisional B, Provisional C, Provisional D, Unlicensed

a. 0-10
b. 11-20
c. 21-30
d. 31-40
e. 41-50
f. 50+
g. Unsure

11. What is the employment status of the ASL Interpreters who work for your company?
    a. W-2 employees
    b. 1099 independent contractors
    c. A mixture of both
    d. Other…

12. Please describe the process with which interpreting requests are shared with ASL Interpreters in Arizona.
    a. Human-generated email to all the interpreters on our roster
    b. Human-generated email to a hand-selected number of interpreters
    c. Automated email generated by our scheduling software
    d. Interpreters must log in to our software to see what jobs are available
    e. Other…

13. What is your cancellation policy for ASL Interpreters working in Arizona?
    a. If a job cancels within 24-hours of the appointment start time, the ASL interpreter gets paid in full

b. If a job cancels within 24-hours of the appointment start time, the ASL interpreter receives partial payment

c. If a job cancels within 48-hours of the appointment start time, the ASL interpreter gets paid in full

d. If a job cancels within 48-hours of the appointment start time, the ASL interpreter receives partial payment

e. Other…

14. What is your travel reimbursement policy for ASL Interpreters working in Arizona?

15. What is the average pay range for certified ASL Interpreters in Arizona?

    a. $25-$35/hour

    b. $35-$45/hour

    c. $45-$55/hour

    d. $55-$65/hour

    e. $65-$75/hour

    f. $75+/hour

    g. Other…

16. What is the average pay range for certified ASL Interpreters accepting legal work in Arizona?

    a. $25-$35/hour

    b. $35-$45/hour

    c. $45-$55/hour

    d. $55-$65/hour

    e. $65-$75/hour

    f. $75-$85/hour

    g. $85+/hour

h. Other…

17. What do you see as the biggest barriers to filling ASL Interpreting requests in Arizona?

18. What are possible solutions to these barriers?

Appendix C:
Hiring Entity (Freelance Interpreters) Survey Questions

1. Which best describes the organization you work for?
    a. K-12 Education
    b. Post-Secondary Education
    c. Business (private sector)
    d. Healthcare
    e. Legal
    f. Performance Venues
    g. Other…

2. What is the employment status of the ASL interpreters that work with your organization in Arizona?
    a. We hire freelance ASL interpreters
    b. We have staff ASL interpreters
    c. We work with both staff and freelance ASL interpreters

3. How many of the following interpreter referral agencies does your organization contract with for interpreting services in Arizona?
    a. ASL-only referral agencies that offer in-person interpreters
    b. Spoken language and ASL referral agencies that offer in-person interpreters
    c. ASL-only Video Remote Interpreting companies
    d. Spoken language and ASL Video Remote Interpreting companies

4. What rate do you pay interpreter referral agencies for ASL interpreting services in Arizona? (choose all that apply)
    a. $60-$70/hr.
    b. $70-$80/hr.
    c. $80-$90/hr.

   d. $90-$100/hr.
   e. $100-$110/hr.
   f. $110-$120/hr.
   g. $120-$130/hr.
   h. more than $130/hr.

5. What is the average number of ASL interpreting hours your organization requests from interpreter referral agencies per month?

6. What percentage of your organization's ASL interpreting work in Arizona is done virtually?

7. What is the average number of ASL interpreting requests that go unfilled in Arizona per month?

8. How difficult is it for your organization to find ASL interpreters in Arizona for the following types of assignments? Very Difficult, Somewhat Difficult, Not Difficult, No Experience, Unsure)
   a. Last-minute requests (less than 72-hour notice)
   b. Requests more than 30 miles from the interpreters' home
   c. Assignments over 5 hours
   d. Requests for a Certified Deaf Interpreters
   e. Request for Tactile/Protactile Interpreters
   f. Requests after normal business hours

9. Are there any other types of ASL assignments in Arizona that are a challenge to fill?

10. Do you have any unfilled staff ASL interpreting positions? If so, how many?

11. How long have these positions been unfilled?

12. When requesting freelance ASL interpreters in Arizona, what license level do you typically request? (check all that apply)
    a. General License
    b. Legal License
    c. Provisional B License
    d. Provisional C License
    e. Provisional D License
    f. Unsure
    g. Other…

13. What is your organization's process for requesting ASL interpreting services in Arizona?

14. What is your organization's process for ensuring that the ASL interpreters you hire meet state licensing requirements?

15. What are the issues you believe that contribute to the interpreter shortage in Arizona?

16. What are possible solutions to these challenges?

Appendix D:
Hiring Entity (Staff Interpreters) Survey Questions

1. Which best describes the organization you work for?
    a. K-12 Education
    b. Post-Secondary Education
    c. Business (private sector)
    d. Healthcare
    e. Legal
    f. Performance Venues
    g. Other…

2. What is the employment status of the ASL interpreters that work with your organization in Arizona?
    a. We hire freelance ASL interpreters
    b. We have staff ASL interpreters
    c. We work with both staff and freelance ASL interpreters

3. What is the average number of hours your staff ASL interpreters work in Arizona per week?

4. What percentage of your organization's ASL interpreting work in Arizona is done virtually?

5. Do you have any unfilled staff ASL interpreting positions? If so, how many?

6. If you have any unfilled staff ASL interpreting positions, how long have these positions been unfilled?

7. How many ASL interpreters on your roster have the following licenses? *(NOTE: Arizona interpreter licenses are granted by the Arizona Commission for the Deaf and the Hard of Hearing and is a separate credential from certification.)*
    a. General
    b. Legal A
    c. Legal C
    d. Legal D
    e. Provisional B
    f. Provisional C
    g. Provisional D
    h. Unlicensed

8. What is the hourly rate/salary for your staff ASL interpreters in Arizona?

9. What are the issues you believe that contribute to the interpreter shortage in Arizona?

10. What are possible solutions to these challenges?

Appendix E:
Hiring Entity (Staff & Freelance Interpreters) Survey Questions

1. Which best describes the organization you work for?
    a. K-12 Education
    b. Post-Secondary Education
    c. Business (private sector)
    d. Healthcare
    e. Legal
    f. Performance Venue
    g. Other…

2. What is the employment status of the ASL interpreters that work with your organization in Arizona?
    a. We hire freelance ASL interpreters
    b. We have staff ASL interpreters
    c. We work with both staff and freelance ASL interpreters

3. What percentage of your ASL interpreting needs in Arizona are covered by your staff interpreters?

4. How many ASL interpreters on your roster have the following licenses? *(NOTE: Arizona interpreter licenses are granted by the Arizona Commission for the Deaf and the Hard of Hearing and is a separate credential from certification.)*
    a. General
    b. Legal A

   c. Legal C
   d. Legal D
   e. Provisional B
   f. Provisional C
   g. Provisional D
   h. Unlicensed

5. What is the hourly rate/salary for your staff ASL interpreters in Arizona?

6. Do you have any unfilled staff ASL interpreting positions? If so, how many?

7. How long have these positions been unfilled?

8. How many of the following interpreter referral agencies does your organization contract with for interpreting services in Arizona?
   a. ASL-only referral agencies that offer in-person interpreters
   b. Spoken language and ASL referral agencies that offer in-person interpreters
   c. ASL-only Video Remote Interpreting companies
   d. Spoken language and ASL Video Remote Interpreting companies

9. What percentage of your organization's ASL interpreting work in Arizona is done virtually?

10. What rate do you pay interpreter referral agencies for interpreting services in Arizona? (choose all that apply)
    a. $60-$70/hr.
    b. $70-$80/hr.
    c. $80-$90/hr.

d. $90-$100/hr.

e. $100-$110/hr.

f. $110-$120/hr.

g. more than $120/hr.

h. Other…

11. What is the average number of ASL interpreting hours your organization requests from interpreter referral agencies in Arizona per month?

12. What is the average number of ASL interpreting requests that go unfilled in Arizona per month?

13. How difficult is it for your organization to find ASL interpreters in Arizona for the following types of assignments? Very Difficult, Somewhat Difficult, Not Difficult, No Experience, Unsure)

    a. Last-minute requests (less than 72-hour notice)

    b. Requests more than 30 miles from the interpreters' home

    c. Assignments over 5 hours

    d. Requests for a Certified Deaf Interpreters

    e. Request for Tactile/Protactile Interpreters

    f. Requests after normal business hours

14. Are there any other types of ASL assignments in Arizona that are a challenge to fill?

15. When requesting freelance ASL interpreters in Arizona, what license level do you typically request? (check all that apply)

    a. General License

    b. Legal License

c. Provisional B License

d. Provisional C License

e. Provisional D License

f. Unsure

g. Other…

16. What is your organization's process for requesting ASL interpreting services in Arizona?

17. What is your organization's process for ensuring that the ASL interpreters you hire meet state licensing requirements?

18. What are the issues you believe that contribute to the interpreter shortage in Arizona?

19. What are possible solutions to these challenges?

Appendix F:
ASL Interpreter (In-State) Survey Questions

1. Are you an ASL interpreter residing in Arizona?
    a. Yes
    b. No

2. Are you an Arizona-licensed interpreter?
    a. Yes
    b. No

3. How long have you been a professional ASL interpreter?
    a. 0-5 years
    b. 6-10 years
    c. 11-15 years
    d. 16-20 years
    e. 21-30 years
    f. 31 years or more

4. What is your hearing status?
    a. Hearing
    b. Deaf
    c. Hard of Hearing

5. In what settings do you primarily work as an ASL interpreter? (choose all that apply)
    a. K-12

   b. In-Person Community
   c. VRS
   d. VRI

6. What percentage of your work is done under the following employment statuses?
   a. Staff Interpreter (W2)
   b. Freelance Interpreter (1099)

7. Where in Arizona do you primarily work as an ASL interpreter?
   a. Phoenix Metro Area
   b. Tucson Metro Area
   c. Flagstaff/Kingman and Northern AZ
   d. Yuma and Southwestern AZ
   e. Lake Havasu and Northwestern AZ
   f. I only work VRS/VRI from home
   g. Other…

8. Which Arizona interpreting license do you currently hold?
   a. General
   b. Legal A
   c. Legal C
   d. Legal D
   e. Provisional B
   f. Provisional C
   g. Provisional D
   h. I do not hold an Arizona interpreting license

9. If you have applied for or received an Arizona interpreting license, how difficult do you find the application and renewal process? *(scale of 1-5)*

10. How many licenses do you hold in states other than Arizona?

11. Are you interested in obtaining advanced interpreting credentials (BEI Advanced/Master, Legal Certification, higher EIPA score, etc.)? If yes, what are your goals?

12. Approximately how many hours a week do you work as a professional ASL interpreter?

    a. 0-5 hours
    b. 6-10 hours
    c. 11-15 hours
    d. 16-20 hours
    e. 21-25 hours
    f. 26-30 hours
    g. 31-35 hours
    h. 36-40 hours
    i. 41-45 hours
    j. More than 45 hours

13. What percentage of your interpreting work is in the following settings?

    a. K-12
    b. In-Person Community
    c. Legal
    d. VRS
    e. VRI

14. In the future, are you interested in working in a different setting than where you primarily interpret now?
    a. Yes
    b. No
    c. Other…

15. If you are a K-12 interpreter, which of the following characteristics are important to you when choosing a school to work with? (Very Important, Somewhat Important, Not Important)
    a. Administration that understands ASL interpreting/Deaf education
    b. Teaming possibilities
    c. Professional development available
    d. Clear and appropriate job description
    e. Avoidance of dual-role
    f. Staff that supports interpreters' role
    g. Matching my skills to Deaf students' needs

16. Besides the points listed in the last question, is there anything else that contributes to you choosing a school you want to work with?

17. If you work as a freelance interpreter, how many ASL interpreting agencies are you currently signed up with (including in-state, out-of-state, spoken language, VRI, etc.)?

18. How many of those agencies do you accept work from 1x/month or more?

19. If you work as a freelance interpreter, which of the following characteristics are important to you when choosing to work with an ASL interpreting agency?
    a. Local agencies in AZ
    b. Primarily provides ASL interpreting services

c. Already have a history of working together

d. Pays me my preferred wage

e. Easy scheduling/invoicing system

f. Offers VRI assignments

g. Deaf-owned

h. Requirements for hire (vaccines, fingerprint clearance, etc.)

i. Policies that reflect industry standards (cancellation fees, travel pay, hour minimums, etc.)

j. Honors Deaf clients' preferred interpreters

k. Understand the ASL interpreting field

l. Understand Deaf culture/community

20. Besides the agency characteristics in the last question, is there anything else that contributes to you choosing the agencies you work with?

21. If you are a freelance interpreter, how important are the following when accepting an interpreting assignment? (Very Important, Somewhat Important, Not Important)

    a. Assignment is through my preferred agency

    b. A setting you enjoy/feel qualified (medical, performance, etc.)

    c. Distance from my home

    d. Agency policies for that assignment (cancellation fees, travel pay, hour minimums, etc.)

    e. Preferred Deaf client

    f. Paid prep time

22. Besides the points listed in the last question, is there anything else that contributes to choosing the assignments you accept?

23. What kinds of scheduling limitations do you have when accepting freelance assignments?

24. What are the issues you believe that contribute to the interpreter shortage in Arizona?

25. What are possible solutions to these challenges?

26. Is there anything else you'd like to share with ACDHH?

Appendix G:
ASL Interpreter (Out of State) Survey Questions

1. Are you an ASL interpreter residing in Arizona?
    a. Yes
    b. No

2. Are you an Arizona-licensed interpreter?
    a. Yes
    b. No

3. How long have you been a professional ASL interpreter?
    a. 0-5 years
    b. 6-10 years
    c. 11-15 years
    d. 16-20 years
    e. 21-30 years
    f. 31 years or more

4. What is your hearing status?
    a. Hearing
    b. Deaf
    c. Hard of Hearing

5. Which of the following credential(s) do you hold or are working toward? (choose all that apply)
    a. CI/CT

   b. NIC
   c. BEI
   d. NAD
   e. NIC written only
   f. BEI written only
   g. SC:L
   h. BEI CIC
   i. EIPA 3.5 or above
   j. EIPA 3.4 or below
   k. Other…

6. Are you interested in obtaining advanced interpreting credentials (BEI Advanced/Master, Legal Certification, higher EIPA score, etc.)? If yes, what are your goals?

7. Which Arizona interpreting license do you currently hold?
   a. General
   b. Legal A
   c. Legal C
   d. Legal D
   e. Provisional B
   f. Provisional C
   g. Provisional D
   h. I do not hold an Arizona interpreting license

8. What prompted you to get an Arizona interpreting license? (check all that apply)
   a. I wanted to be able to work in-person in Arizona
   b. I work for a VRI company that required me to get it

   c. I work for a VRI company that provide it for me
   d. Other…

9. How many interpreting licenses do you have in states other than Arizona?

10. How difficult do you find the application and renewal process for maintaining an Arizona interpreting license? <scale of 1-5>

11. What percentage of your VRI interpreting work is with Deaf individuals in Arizona?
    a. There's no way to know when I'm interpreting for a Deaf person in Arizona
    b. 1-10%
    c. 11-20%
    d. 21-30%
    e. 31-40%
    f. 41-50%
    g. 41-60%
    h. 61-70%
    i. 71-80%
    j. 81-90%
    k. 91-100%

12. When providing interpreting services for Deaf clients in Arizona, what percentage of your work is in the following settings?
    a. K-12
    b. Medical
    c. Legal
    d. Business

e. Government

13. What do you believe are the causes for the current ASL interpreter shortage?

14. What do you think can be done to address these issues?

15. Is there anything else you'd like to share with ACDHH?

Appendix H:
Spoken Language Referral Agency Survey Questions

1. What types of services does your company offer for ASL Interpretation? (choose all that apply)
    a. On-Site Interpreting
    b. Scheduled VRI Interpreting
    c. On-Demand VRI Interpreting
    d. Other…

2. What geographic areas do you provide ASL Interpreting services in? (choose all that apply)
    a. All over Arizona
    b. Phoenix Metro
    c. Tucson/Southern Arizona
    d. Flagstaff/Northern Arizona
    e. Yuma/Southwestern Arizona
    f. Lake Havasu/Northwestern Arizona
    g. Other…

3. Approximately how many clients/businesses in Arizona have utilized your ASL Interpreting services within the past year?
    a. 0-5
    b. 6-10
    c. 11-15
    d. 16-20
    e. 21-25
    f. 25+
    g. Other…

4. Approximately how many requests does your company receive for ASL interpreting in Arizona each month?
    a. 0-10
    b. 11-25
    c. 26-50
    d. 50-100
    e. 100+
    f. Other…

5. Approximately how many of those requests go unfilled each month?

6. How difficult is it for your company to find interpreters for the following types of assignments in Arizona? (Very Difficult, Somewhat Difficult, Not Difficult, No Experience, Unsure)
    a. Last-minute requests (less than 72-hour notice)
    b. Requests more than 30 miles from the interpreters' home
    c. Assignments over 5 hours
    d. Requests for a Certified Deaf Interpreters
    e. Request for Tactile/Protactile Interpreters
    f. Requests after normal business hours

7. Are there any other types of assignments in Arizona that are a challenge to fill?

8. Of the assignments that go unfilled, what is the percentage of VRI assignments compared to in-person assignments?

9. How many Arizona interpreters do you currently have on your roster with RID or BEI certification?
    a. 0-10
    b. 11-20
    c. 21-30
    d. 31-40
    e. 41-50
    f. 50+
    g. Other…

10. How many interpreters on your roster have the following licenses? (NOTE: Arizona interpreter licenses are granted by the Arizona Commission for the Deaf and the Hard of Hearing and is a separate credential from certification.)

11. License Options: General, Legal A, Legal C, Legal D, Provisional B, Provisional C, Provisional D, Unlicensed
    a. 0-10
    b. 11-20
    c. 21-30
    d. 31-40
    e. 41-50
    f. 50+
    g. Unsure

12. What is the employment status of the ASL Interpreters who work for your company?
    a. W-2 employees
    b. 1099 independent contractors
    c. A mixture of both
    d. Other…

13. Please describe the process with which interpreting requests are shared with ASL Interpreters in Arizona.
    a. Human-generated email to all the interpreters on our roster
    b. Human-generated email to a hand-selected number of interpreters
    c. Automated email generated by our scheduling software
    d. Interpreters must log in to our software to see what jobs are available
    e. Other…

14. What is your cancellation policy for ASL Interpreters working in Arizona?
    a. If a job cancels within 24-hours of the appointment start time, the ASL interpreter gets paid in full
    b. If a job cancels within 24-hours of the appointment start time, the ASL interpreter receives partial payment
    c. If a job cancels within 48-hours of the appointment start time, the ASL interpreter gets paid in full
    d. If a job cancels within 48-hours of the appointment start time, the ASL interpreter receives partial payment
    e. Other…

15. What is your travel reimbursement policy for ASL Interpreters working in Arizona?

16. What is the average pay range for certified ASL Interpreters in Arizona?
    a. $25-$35/hour
    b. $35-$45/hour
    c. $45-$55/hour
    d. $55-$65/hour
    e. $65-$75/hour
    f. $75+/hour
    g. Other…

17. What is the average pay range for certified ASL Interpreters accepting legal work in Arizona?
    a. $25-$35/hour
    b. $35-$45/hour
    c. $45-$55/hour
    d. $55-$65/hour
    e. $65-$75/hour
    f. $75-$85/hour
    g. $85+/hour
    h. Other…

18. What do you see as the biggest barriers to filling ASL Interpreting requests in Arizona?

19. What are possible solutions to these barriers?

Appendix I:
Interpreter Education Program Interview Questions

1. What was the average number of students graduating from your program pre-COVID?
2. What is the average number of students graduating from your program post-COVID?
3. What are some barriers for students' enrollment?
4. How many students end up working in the field of ASL interpreting?
5. Which credentialing exams are students taking more often?
6. What is the licensure status of graduates from your program?
7. How many of your graduates are working in the K-12 setting?
8. What have you noticed to be barriers for entering the ASL interpreting field after graduation?
9. What have you noticed to be barriers for graduates to become certified?
10. Why do you believe there is an interpreting shortage?
11. What are some possible solutions?

Appendix J:
Interpreter Education Programs in Arizona

Institution Name	Degree	Location	Specialization
Coconino Community College	A.A.	Flagstaff, AZ	This program provides an introduction to ASL interpreting, but is not considered a complete Interpreter Education Program. Graduates are encouraged to complete their studies at the University of Arizona's interpreter program.
Phoenix College (Maricopa County Community College District)	A.A.	Phoenix, AZ	General interpreting skills for any setting
University of Arizona	B.S.	Tucson, AZ	K-12 education interpreting skills

Appendix K:
Entry-Level Testing Accepted in Arizona

Test	Administering Body	Degree Requirement	Tests Offered	Credential Achieved
BEI	Board of Evaluation of Interpreters, Texas Health and Human Services	30 college credits	Test of English Proficiency (TEP) **available to both deaf and hearing interpreters*	Passing the TEP grants eligibility to take the BEI performance test and qualifies for an Arizona Prov. C license.
		60 college credits	BEI: Basic Performance Test **available to both deaf and hearing interpreters*	Passing the BEI: Basic qualifies for an Arizona General license.
EIPA	Boys Town National Research Hospital	N/A	Written Exam	The EIPA Written Exam is currently not required in Arizona.
		N/A	Performance Exam **only available to hearing interpreters*	The Arizona Dept. of Education currently recommends schools require a minimum EIPA score of 3.5 to interpret for deaf children. Those not achieving a 3.5 can still provide services but must submit a professional development plan. The EIPA is a diagnostic evaluation, not a credentialing exam. Therefore, an EIPA score does not qualify for an Arizona General license. A score of 4.0+ can, however, qualify a Provisional C licensee to upgrade to a Provisional B.
RID	Center for the Assessment of Sign Language Interpretation (CASLI)	N/A	CASLI Generalist Knowledge Exam (CGKE) **available to both deaf and hearing interpreters*	Passing the CGKE grants eligibility to take the CASLI performance test and qualifies for an Arizona Prov. C license.
		BA/BS degree	CASLI	Passing the CGKE and CASLI

		or RID's alternative pathway program	Generalist Performance Exam *only available to hearing interpreters*	Generalist Performance Exam earns an interpreter National Interpreter Certification (NIC) and qualifies for an Arizona General license.
		BA/BS degree or RID's alternative pathway program	CASLI Generalist Performance Exam for Deaf Interpreters *only available to deaf interpreters*	Passing the CGKE and CASLI Generalist Performance Exam for Deaf Interpreters earns an interpreter National Interpreter Certification (NIC) and qualifies for an Arizona General license.

Appendix L:
Interpreter Testing Costs

	Test	Cost	Travel	Application Process	Availability
RID Exams	RID CASLI Generalist Knowledge Exam (for hearing interpreters)	$350-450	N/A	- Apply for exam on CASLI website - Wait up to 10 days for exam to be added to account - Purchase exam - Schedule with CASLI	Dependent on testing site availability
	RID CASLI Performance Exam (for hearing interpreters)	$450-500	N/A	- Apply for exam on CASLI website - Wait up to 10 days for exam to be added to account - Purchase exam - Schedule with CASLI	Phoenix College proctor site *Must take performance exam within 5 years of passing the written*
	RID CASLI Generalist Knowledge Exam (for Deaf interpreters)	$225-280	N/A	- Apply for exam on CASLI website - Wait for exam to be added to account - Purchase exam - Schedule with CASLI	Dependent on testing site availability
	RID CASLI Generalist Performance Exam for CDI (for Deaf interpreters)	$310-395	N/A	- Apply for exam on CASLI website - Wait for exam to be added to account - Purchase exam - Schedule with CASLI	Phoenix College proctor site *Must take performance exam within 8 years of passing the written*
BEI Exams	BEI Test of English Proficiency	$95	Travel and Lodgings to Texas (or other state that proctors the BEI)	- Send hard copy of application and cashier's check via mail - Wait 30 days for application approval - Schedule test within 90 days of approval	Every March and August, BEI allows out-of-state testers to schedule both the TEP and the Performance Test in the same weekend. If an Arizona interpreter
	BEI: Basic Performance Test	$145	Travel and Lodgings to Texas (or other state that proctors the BEI)	- Send hard copy of application and cashier's check via mail - Wait 30 days for application approval - Choose from available testing dates sent via email	

					misses those dates, they will have to travel to Texas twice.
	Arizona Court Interpreter Credentialing Program Written Exam	$80	N/A	Submit online form	Offered twice a year in Phoenix and Tucson
	BEI Court Interpreter Certification Test	$50	Travel and Lodgings to Texas (or other state that proctors the BEI CIC)	- Send hard copy of application and cashier's check via mail - Wait 30 days for application approval - Choose from available testing dates sent via email	Dependent on testing site availability
EIPA Exams	EIPA Written Test	$250	Travel and Lodging to a state that offers this exam	Online registration	This test is not required in AZ and is not currently offered in-state
	EIPA Performance Test	$350	N/A	Online registration	Offered a few times a year at Phoenix College and a testing site in Buckeye

Appendix M:
Recommendations for Navigating the ASL Interpreter Shortage

Recommendations for Navigating the ASL Interpreter Shortage

amended from the National Deaf Center, "The ASL Interpreter Shortage and Its Impact on Accessibility in College Settings" (2022)

1. Include the deaf community when developing policies about services that impact them
2. Listen, validate, and support the interpreters and their work
3. Learn more about the ASL interpreter request system used at your institution and reduce complexities in the request pipeline
4. Eliminate barriers between the the deaf consumer and the ASL interpreter
5. Consider hiring staff interpreters and providing guaranteed hours
6. Use a combination of agency and staff service providers
7. Contribute to scholarship or training programs that will benefit your business.
8. Provide on-demand VRI services from vetted Interpreter Referral Agencies
9. Provide portal-to-portal travel for interpreters
10. Pay for preparation time, if necessary
11. If your business works with interpreters often, provide a dedicated office space for interpreters to take remote assignments between in-person assignments
12. Consider collaborative opportunities to share staff interpreting contracts with other institutions
13. Offer free workshops with CEUs
14. Contact ACDHH for free consultation on optimal strategies for hiring ASL interpreters