

From: [Janice DiGiovanni](#)
To: [DODHH](#)
Subject: Comment on proposed Rules
Date: Tuesday, April 01, 2014 3:56:13 PM

Please take these comments into consideration. Thank you.

Janice DiGiovanni

Bert Goens Learning Center Principal

If the rules are promulgated as written, the implications for Deaf and Hard of Hearing children in public schools will be devastating in that it will alter how students access the curriculum and immediately place schools in non-compliance in that they will be unable to provide students with interpreters. As an administrator of special education programs and services in Michigan, I strongly supports raising the standards of staff that work with students with disabilities. However, raising standards in this manner will deny student access to the curriculum because of the number of qualified interpreters will be significantly reduced for the foreseeable future.

R 393.5024, Standard Level 2

(2)(a) Do Not Support

This requirement will potentially limit districts that employ interpreters qualified to only work in the educational environment (EIPA certified). A qualified interpreter for the educational setting is able to provide adequate communication about the educational setting and IEP document and process.

R 393.5026, Educational Interpreter Qualifications

(1)(a)(b) Support w/ Modification

If a written assessment is required, the DODHH must offer the test. Passage of a written assessment should be required after August 31, 2016.

(2)(3) Support w/ Modification

Some flexibility should be permitted to allow elementary or secondary certification in either setting. This would allow for school districts to meet changing needs of the student population and respond to these needs in a timely manner. Subrule (8) was included in **R 393.5026 (2)** and should be included here for **R393.5026 (3)**.

(4)(j) Support w/ Modification

School districts should only be responsible for providing the team interpreter certified for the educational setting.

(5) Support w/ Modification

Language should be modified to read: Upon absence of a regularly assigned educational interpreter, a long-term substitute interpreter shall be used in an elementary and secondary environment when an absence extends beyond 20 school days. The long term-substitute shall possess an EIPA 3.5, Michigan BEI II, or minimum standard level 2 or 3. A short-term substitute interpreter shall be used if an absence is 20 school days or less. A short-term substitute shall possess a Michigan BEI I, EIPA 3.0, or minimum standard level 2 or 3 in an elementary and/or secondary setting.

(8) Support w/ Modification

A provision should be included that allows for any educational interpreter to be hired with an

EIPA score of 3.5 or higher on a temporary certificate with the provision that he/she have three years from the date of their test to meet the 4.0 standard. A temporary certificate would allow interpreters to work for three years as they continue to improve their skills.

(9) Support

R 393.5027 Exceptions

(3) Support w/ Modification

The decision to determine if an exception is granted shall be made by a committee comprised of MDE staff and not a stand-alone individual from a single organization.

(3)(a) Do Not Support

Compensation is solely the responsibility of the school district to determine. An outside agency cannot have the authority to determine what is “competitive”. “Division assistance” is not defined in **R 393.5001**. This wording should not be included without clarification.

(3)(b) Support

(3)(c) Do Not Support

IEP Team placement decisions are not to be driven by staffing qualifications. Making these determinations based on staff qualifications limits students’ access to the Least Restrictive Environment (LRE) which is not allowable by law.

(3)(d) Do Not Support

Parental approval should not be required if the interpreter possesses a minimum 3.5 EIPA score, BEI, or national certification.

(3)(e) Support w/ Modification

A committee, comprised of MDE staff and not a stand-alone individual from a single organization, shall make the review of an exception.

R 393.5051 Practice within Standard Level

(3) Support

(10) Support w/ Modifications

School districts should only be responsible for providing the team interpreter certified for the educational setting. (See R 393.5026 (j))

R 393.5054 Supervision of Student Interpreter Practicum Experience

(3) Do Not Support

Similarly, schools settings do not require supervising teachers to obtain consent for intern teachers.

R 393.5055 VRI Standards

(12)(a) Support w/ Modification

Change “Age 3” to “birth”. Some students enter programs before age 3.

(12)(b) Do Not Support

The description of this proposed rule is already addressed in other rules/regulations, and does not have a place in rules related to interpreter qualifications. If parents do not agree with the

determination of an IEP/504 decision, their rights are outlined and supported through procedural safeguards.

In conclusion, I thank you for this opportunity to provide input on this critical issue and for your consideration of my comments. It is my hope that presenting the many issues and concerns surrounding the proposed interpreter rule revisions will have a positive impact on the final product released by the DODHH.

Dave Manson

Van Buren Intermediate School District
Director of Special Education

[REDACTED]

(269) [REDACTED]

(269) [REDACTED]

"Providing Educational Services for a Better Tomorrow"

Janice DiGiovanni
Principal
Bert Goens Learning Center

[REDACTED]

From: [Peter Johnson](#)
To: [DODHH](#)
Subject: DELEG-DODHH proposed Interpreter Rules.
Date: Tuesday, April 01, 2014 3:16:34 PM

Public Comment
Michigan Department of Civil Rights
Division on Deaf and Hard of Hearing
201 N Washington Square
Lansing, MI 48913

To whom it may concern,

As a member of the Michigan Association of Administrators of Special Education (MAASE). I want to submit comment on the proposed administrative rules for Qualified Interpreter-General Rules per your March 14, 2014 Notice of Public Hearing.

I believe that if the rules are promulgated as written, the implications for Deaf and Hard of Hearing children in public schools will be devastating in that it will alter how students access the curriculum and immediately place schools in non-compliance in that they will be unable to provide students with interpreters. As an administrator of special education I strongly supports raising the standards of staff that work with students with disabilities. However, raising standards in this manner will deny student access to the curriculum because of the number of qualified interpreters will be significantly reduced for the foreseeable future.

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R 393.5026, Educational Interpreter Qualifications

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A provision should be included that allows for any educational interpreter to be hired with an EIPA score of 3.5 or higher on a temporary certificate with the provision that he/she have three years from the date of their test to meet the 4.0 standard. A temporary certificate would allow interpreters to work for three years as they continue to improve their skills.

(9) Support

R 393.5027 Exceptions

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The decision to determine if an exception is granted shall be made by a committee comprised of MDE staff and not a stand-alone individual from a single organization.

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Compensation is solely the responsibility of the school district to determine. An outside agency cannot have the authority to determine what is “competitive”. “Division assistance” is not defined in **R 393.5001**. This wording should not be included without clarification.

(3)(b) Support

(3)(c) Do Not Support

IEP Team placement decisions are not to be driven by staffing qualifications. Making these determinations based on staff qualifications limits students’ access to the Least Restrictive Environment (LRE) which is not allowable by law.

(3)(d) Do Not Support

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A committee, comprised of MDE staff and not a stand-alone individual from a single organization, shall make the review of an exception.

R 393.5051 Practice within Standard Level

(3) Support

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School districts should only be responsible for providing the team interpreter certified for the educational setting. (See R 393.5026 (j))

R 393.5054 Supervision of Student Interpreter Practicum Experience

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Similarly, schools settings do not require supervising teachers to obtain consent for intern teachers.

R 393.5055 VRI Standards

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The description of this proposed rule is already addressed in other rules/regulations, and does not have a place in rules related to interpreter qualifications. If parents do not agree with the determination of an IEP/504 decision, their rights are outlined and supported through procedural safeguards.

In conclusion, we thank you for this opportunity to provide input on this critical issue and for your consideration of these comments. Attached please find a summary table of these comments. Please do not hesitate to contact us if MAASE can provide further information or if we can support the implementation of these standards with our recommended changes. It is our hope that presenting the many issues and concerns surrounding the proposed interpreter rule revisions will have a positive impact on the final product released by the DODHH.

Peter J. Johnson, Ed.D
Principal
Kent Transition Center
1800 Leffingwell N.E.
Grand Rapids, MI 49505
p. 616 [REDACTED]
f. 616 [REDACTED]

From: [Dave Manson](#)
To: [DODHH](#)
Subject: Public Comment on proposed Rules
Date: Tuesday, April 01, 2014 2:36:56 PM

I have worked collaboratively with my professional organization (MAASE) in creating the following information for public comment on the proposed rules. Please take these comments into consideration.

Thank you,
David Manson

If the rules are promulgated as written, the implications for Deaf and Hard of Hearing children in public schools will be devastating in that it will alter how students access the curriculum and immediately place schools in non-compliance in that they will be unable to provide students with interpreters. As an administrator of special education programs and services in Michigan, I strongly supports raising the standards of staff that work with students with disabilities. However, raising standards in this manner will deny student access to the curriculum because of the number of qualified interpreters will be significantly reduced for the foreseeable future.

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Similarly, schools settings do not require supervising teachers to obtain consent for intern teachers.

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Dave Manson

Van Buren Intermediate School District
Director of Special Education

[REDACTED]
(269) [REDACTED]
(269) [REDACTED]

"Providing Educational Services for a Better Tomorrow"

From: [Linda Scriptor](#)
To: [DODHH](#)
Subject: I support pa204 I need interpter very much
Date: Tuesday, April 01, 2014 2:58:29 PM

Sent from my iPhone

From: [Jim Yanna](#)
To: [DODHH](#)
Subject: Proposed Interpreter Rules
Date: Wednesday, April 02, 2014 8:47:30 AM

I have worked collaboratively with my professional organization (MAASE) in creating the following information for public comment on the proposed rules. Please take these comments into consideration.

Thank you,
Dr. James V. Yanna
Supervisor - Deaf and Hard of Hearing Program
Van Buren Intermediate School District

If the rules are promulgated as written, the implications for Deaf and Hard of Hearing children in public schools will be devastating in that it will alter how students access the curriculum and immediately place schools in non-compliance in that they will be unable to provide students with interpreters. As an administrator of special education programs and services in Michigan, I strongly supports raising the standards of staff that work with students with disabilities. However, raising standards in this manner will deny student access to the curriculum because of the number of qualified interpreters will be significantly reduced for the foreseeable future.

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In conclusion, I thank you for this opportunity to provide input on this critical issue and for your consideration of my comments. It is my hope that presenting the many issues and concerns surrounding the proposed interpreter rule revisions will have a positive impact on the final product released by the DODHH.

Dr. James V. Yanna
Special Education Supervisor
Van Buren Intermediate School District
(269) [REDACTED]
[REDACTED]

April 2, 2014

Public Comment
Michigan Department of Civil Rights
Division on Deaf and Hard of Hearing
201 N Washington Square
Lansing, MI 48913

To whom it may concern,

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R 393.5024. Standard Level 2 (2)(a)

Do Not Support: This requirement will potentially limit districts that employ interpreters qualified to only work in the educational environment (EIPA certified). A qualified interpreter for the educational setting is able to provide adequate communication about the educational setting and IEP document and process.

R 393.5026. Educational Interpreter Qualifications

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Sincerely,



Dawn G. Bentley, Ed.S.

Executive Director of Special Education
Livingston Educational Service Agency