



**Oklahoma Registry of Interpreters for the Deaf**  
Executive Board | [board@okrid.org](mailto:board@okrid.org)

February 2, 2023

Oklahoma Department of Rehabilitation Services  
3535 NW 58th, Suite 500  
Oklahoma City, OK 73112

Re: 2024 proposed admin rule changes

Dear DRS Commissioners, Director, and staff:

Oklahoma Registry of Interpreters for the Deaf (OKRID) is a professional sign language interpreting organization and an affiliate chapter of the national professional organization, Registry of Interpreters for the Deaf (RID). We provide professional development, advocacy, and networking opportunities in an effort to maintain a high standard of practice for sign language interpreters in Oklahoma.

As a professional organization of sign language interpreters, many of our members will be affected by rule changes proposed by the Interpreter Certification Resource Center (ICRC). We see many positives to the proposed changes, and thank the ICRC and their advisory committee for work on these improvements.

We have one area of concern, which is the proposed changes to increase the CEU requirements annually from 10 hours to 20 hours, as well as increase the ethics requirement from 1 hour to 5 hours annually **[612:10-13-20 (b) Continuing Education Requirements]**. The Board is in full support of increasing continuing education requirements, however, we are concerned increasing the volume without additional flexibility for timeline will create barriers for practitioners within our state.

It is common for professional credentials to maintain CEUs on a multi year cycle. This allows some flexibility when people's lives are affected by things like maternity, new jobs, pandemics, or serious health issues. Additionally, it can be difficult to attain so many CEUs in Oklahoma in a given year, meaning people may need to travel out of state and incur additional costs to maintain their credentials. The ICRC proposal does not do this; it maintains a one calendar year cycle.

We urge the commission and ICRC to consider amending this rule to allow for a 20 hour (2.0 CEU) per year *average* over multiple years (40 in 2 years, 60 in 3, etc).

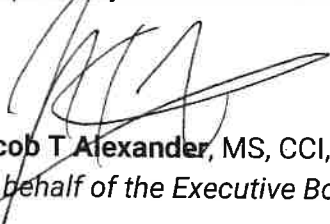
In addition, the increase from 1 hour of ethics training to 5 is disproportionately large. While the overall hours are being increased by 100% (10 hours to 20 hours), the ethics requirement is being increased by 500% (1 hour to 5 hours). This is a higher ethics requirement than any other known certification program.

As one of the primary providers of professional development opportunities in Oklahoma, OKRID does not have the capacity to support this increased requirement if it is enacted. Many interpreters already struggle to attain the required number of hours, with ethics designation being even more difficult to attain. This large increase is most likely unsustainable for practitioners.

We value ethical development, and support an increased requirement. However, we urge the commission and ICRC to consider a more attainable requirement, such as 2 or 3 hours averaged per year, over a multi year cycle (aligned with the previous suggestion).

Thank you for the opportunity to make comment on the following changes, as they directly affect not only the interpreting community in Oklahoma but the Deaf communities we serve as well.

Respectfully,



**Jacob T. Alexander**, MS, CCI, NIC | Vice President  
*On behalf of the Executive Board*

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