NOVARA
CONSULTING GROUP

The Price of Admission

Heather Grizzle · September 29, 2026

When Deaf-led firms turn away state offices that cannot pay, the gap between Deaf residents widens. Exchange, not refusal, is the better answer.

Contents

1. The offices that cannot pay are the ones that need it most
2. What a flat no costs
3. Exchange is not charity
4. What a better answer looks like
5. Who the expertise is for
6. References

When Deaf-led expertise is priced beyond the states that need it most

Some of the state offices that serve Deaf, DeafBlind, and hard of hearing residents operate with a handful of staff and little room in their budgets for outside expertise. When those offices go looking for help, the conversation can end at the fee: no reduced scope, no counterproposal, and no question about what the office might offer in place of cash. This is not an account of one firm or one state, and none is named here. It raises a question the Deaf community routinely asks of hearing-run institutions and asks less often of its own professional class.

Nothing in that question disputes the right of a Deaf-led firm to be paid. Deaf professionals have long pushed to be compensated as experts rather than consulted as volunteers, and a firm that gives its work away indefinitely does not survive long enough to help anyone. The question is narrower and harder. Expertise built on Deaf language, Deaf lived experience, and Deaf community trust carries some obligation back toward the communities it was built on, including the ones that cannot pay market rates. When an under-resourced state office is turned away without an alternative on the table, that obligation has not been met, and the refusal says something about who the expertise is now for.

The offices that cannot pay are the ones that need it most

State infrastructure for Deaf, DeafBlind, and hard of hearing residents is uneven. Massachusetts established a standalone commission in statute, with its own commissioner and advisory board[1]. Minnesota runs its services as a division inside the Department of Human Services, whose commissioner receives the division's appropriations[2]. Idaho's council receives its appropriation through the Division of Vocational Rehabilitation[3], and in fiscal year 2023 reported a budget of about $510,400 and roughly five full-time-equivalent staff, about 25 cents per Idahoan, for an estimated 257,573 deaf and hard of hearing residents[4]. A state with a thin appropriation does not have fewer Deaf residents, fewer interpreter shortages, or fewer schools making placement decisions. It has fewer people available to work on those problems.

Many of the policy questions reaching these offices are shared across states. Courts already use video remote interpreting, and the National Association of the Deaf has warned that "many courts and legal service providers do not always understand or recognize that VRI may not provide the effective communication" deaf people need[5]. Public authorities have been deciding where to use signing avatars since at least 2018, when the World Federation of the Deaf and WASLI jointly raised concern about how those decisions were being managed[6], and Gallaudet's Department of Linguistics has since warned that AI developers are training on ASL video collected without community involvement[7]. A well-resourced state can hire or contract the expertise to write procurement language, test vendor claims, and push back before a contract is signed. An under-resourced state is more likely to take vendor materials at face value, because nobody on staff has the time or the specialist background to do otherwise. When outside Deaf-led expertise flows only to the states that can pay for it, the likely result is that the states with the most capacity get stronger, the states with the least absorb whatever is sold to them, and the gap between Deaf residents in different states widens where governance is weakest.

What a flat no costs

A firm has every right to decline work. Capacity is finite, some engagements carry liability that cannot be taken on unpaid, and a practice that says yes to everything eventually delivers nothing well. The problem is not the decline. The problem is a decline

that closes the conversation rather than reshaping it, because that choice has costs well beyond the single engagement.

The first cost falls on the residents the office serves, who now go without, or go with whatever a vendor was willing to provide at no charge. The second falls on the firm itself. Relationships with small state offices can be durable: their staff move into larger roles, sit on national committees, write grant applications, and remember who answered when they had nothing to offer. A refusal on price alone trades a long relationship for the avoidance of a short, unpaid one. The third cost falls on the field. The case for Deaf-led expertise has long rested on the claim that Deaf leadership changes outcomes, not merely representation. A Deaf-led firm that behaves exactly like any other vendor, serving whoever can pay and no one else, weakens that claim for every Deaf professional who makes it. Being Deaf-led is a statement about who holds authority; it is not, on its own, evidence that the authority is being used differently.

Exchange is not charity

The usual objection is that working without payment devalues the work. That objection confuses two different things. Giving work away is charity. Exchanging work for something other than cash is ordinary economic practice, and the institutions that fund public work already treat it that way.

Federal grant rules are the clearest example. Under the Uniform Guidance, recipients may meet cost-sharing requirements with third-party in-kind contributions. Their fair market value must be documented and, to the extent feasible, supported by the same methods the recipient uses internally, and services donated by another organization's employees are valued at the employee's regular rate of pay plus allowable fringe benefits and indirect costs[8]. A consulting firm's donated hours on a federally funded project can therefore count toward a state office's required match, at a documented dollar value, provided the contribution meets the rule's conditions. The firm is not giving its work away so much as converting it into something the office can use and a funder will count.

The professions have also long accepted that expertise carries a duty toward those who cannot pay. The American Bar Association's Model Rule 6.1 states that "every lawyer has a professional responsibility to provide legal services to those unable to pay," sets an aspirational figure of 50 hours a year, and directs that a substantial ma-

jority of those hours go to persons of limited means or to "charitable, religious, civic, community, governmental and educational organizations" serving them[9]. The Deaf community's own professional codes already contain the same idea. The NAD-RID Code of Professional Conduct, which governs sign language interpreters, directs them to "charge fair and reasonable fees" and, in the same section, to "render pro bono services in a fair and reasonable manner"[10]. No comparable written standard appears to exist for Deaf-led consulting firms, which sit outside that code.

What a better answer looks like

None of the alternatives below requires a firm to work for free, and most of them leave the firm better positioned than a refusal would. Each one begins from the same move: asking what the office does have, instead of stopping at what it lacks.

1. Shrink the scope before declining. Many requests contain a smallest useful piece: a one-page review of a vendor claim, a set of questions to put in a solicitation, an hour with the staff who will write the contract. A firm can offer that piece and price or trade it accordingly.

2. Trade for what the office controls. State offices hold things firms cannot buy: access to program data, standing to co-author, the ability to name a partner in a grant application or budget request, and formal letters of support. Those have real value to a firm building a track record, and the firm's own donated hours, properly documented, can count as the office's match on a federal award.

3. Tie the fee to future funding. A firm can be written into the office's next grant proposal or appropriation request as a named partner, with the fee paid if and when the funding arrives. The firm takes a risk; it also gets a seat in the application rather than a line on a vendor list.

4. Publish a sliding scale. A rate structure set in advance, tied to agency budget size, removes the negotiation from the moment of need and signals that small offices were anticipated rather than tolerated.

5. Pool small states. Several under-resourced offices facing the same question can share one engagement and split its cost. States already buy together this way through cooperative purchasing programs such as NASPO ValuePoint[11].

6. Reserve a fixed share of capacity. Following the pro bono model, a firm can commit a set number of hours each year to offices that cannot pay, and decide in advance how those hours are allocated so that no request depends on who happened to ask.

A firm that genuinely cannot do any of these can still do one thing: say so, explain why, and point the office to someone who can. A no that comes with a referral is a different act from a no that ends the conversation.

Who the expertise is for

The modern Deaf rights movement took one of its defining stands on the principle that Deaf people should hold authority over Deaf institutions. In March 1988, the Deaf President Now protest at Gallaudet demanded a Deaf president and a Board of Trustees with a 51 percent Deaf majority, and the board agreed to all four of the protesters' demands within a week[12]. That principle does not lose its force when the people holding authority are Deaf. A Deaf-led firm that serves only the states able to pay full rate has, in practice, let the market decide which Deaf residents receive Deaf-led expertise, and the market tends to choose the ones who already have the most.

Much of grassroots Deaf community life has long depended on informal exchange: skills shared, favors traded, letters written for one another's applications. Professionalization can add payment to that tradition without replacing it. The standard worth holding is simple enough to state. When a state office with real need and no budget asks for help, the first answer should be a question about what it can offer, and the last answer, if the answer is no, should include somewhere else to go. That is not yet the norm. Until it is, any office turned away on price can bring that decline to Novara Consulting Group, where an empty budget is met the way grassroots Deaf communities have long met it, by sitting down together and working something out, and treated as the start of a beautiful future rather than the end of a conversation. Applications gladly accepted.

References

1. Massachusetts General Laws, Chapter 6, § 192. https://malegislature.gov/Laws/GeneralLaws/PartI/TitleII/Chapter6/Section192
2. Minnesota Statutes § 256C.233. https://www.revisor.mn.gov/statutes/2024/cite/256C.233

3. Idaho Legislature. (2025). House Bill 460, appropriation to the Division of Vocational Rehabilitation. https://legislature.idaho.gov/wp-content/uploads/sessioninfo/2025/legislation/H0460.pdf
4. Idaho Council for the Deaf and Hard of Hearing. Annual Report, Fiscal Year 2023. https://cdhh.idaho.gov/wp-content/uploads/2025/03/CDHH-FY-2023-Annual-Report-Infographic.pdf
5. National Association of the Deaf. (2022). Position Statement on Video Remote Interpreting in Courts and Legal Settings. https://www.nad.org/wp-content/uploads/2023/04/NAD-Position-Statement-on-VRI-in-Court_final.pdf
6. World Federation of the Deaf and World Association of Sign Language Interpreters. (2018). WFD and WASLI Issue Statement on Signing Avatars. https://wfdeaf.org/wfd-wasli-issue-statement-signing-avatars/
7. Gallaudet University, Department of Linguistics. (2025, July 24). ASL and AI Tools [Position statement]. https://gallaudet.edu/linguistics/position-statements/asl-and-ai-tools/
8. Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, 2 C.F.R. § 200.306 (Cost sharing). https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/section-200.306
9. American Bar Association. Model Rules of Professional Conduct, Rule 6.1: Voluntary Pro Bono Publico Service. https://www.americanbar.org/groups/professional_responsibility/publications/model_rules_of_professional_conduct/rule_6_1_voluntary_pro_bono_publico_service/
10. National Association of the Deaf and Registry of Interpreters for the Deaf. (2005). NAD-RID Code of Professional Conduct, 6.7 and 6.8. https://rid.org/wp-content/uploads/2023/03/NAD_RID-Code-of-Professional-Conduct-508-Accessible.pdf
11. NASPO ValuePoint. Why Use Cooperative Purchasing. https://www.naspovaluepoint.org/why-cooperative-purchasing/
12. Global Nonviolent Action Database. Gallaudet University students protest for a deaf university president (Deaf President Now), 1988. Swarthmore College.

https://nvdatabase.swarthmore.edu/content/gallaudet-university-students-protest-deaf-university-president-deaf-president-now-1988

TIPS

Know something about a sign language AI system that the public should know? Send it to tips@novaracg.com. Every tip is read by me and kept confidential. If you work in the UK, writing to us is not by itself a protected disclosure under the Public Interest Disclosure Act 1998, so before you share employer information, check your options with Protect (protect-advice.org.uk), the free whistleblowing advice line.

SUPPORT NCG

NCG does this work without vendor money, so our findings stay ours. If it has been useful to you, you can support NCG's independent work here. NCG is a for-profit company, not a charity. Contributions are not tax-deductible and buy no service or influence.

How to cite

Grizzle, H. M. (2026, September 29). The Price of Admission. Novara Consulting Group. https://www.novaracg.com/2026/09/29/the-price-of-admission/