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New York hat nie gesagt, wer dolmetschen darf

Heather Grizzle · October 12, 2026

New York definiert Dolmetschdienste für den Bildungsbereich, legt jedoch keine Qualifikation oder Bewertung für Dolmetscher fest. Die New York-Datei des NDEDI zeigt diese Lücke auf.

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New York's regulations define what an educational interpreter does and never say who may do it. A Capital Region BOCES posting shows what fills that silence.

KURZ GEFASST

- New York's special education regulation, 8 NYCRR 200.1(nnn), defines interpreting services by type and sets no credential, assessment score or registry for the person providing them.
- Eine aktuelle Stellenausschreibung der Capital Region BOCES für einen Educational Interpreter akzeptiert einen High-School-Abschluss, vier Jahre Erfahrung und einen College-ASL-Kurs. Es wird keine Zertifizierung genannt.
- Nebraska, Michigan, Maryland, Massachusetts und Maine schreiben jeweils eine Mindestanforderung für Dolmetscher in Gesetz oder Verordnung fest. New York, mit 3.644 als Deafness oder Hearing Impairment identifizierten Schülern, schreibt keine fest.
- Der Bundesstaat veröffentlicht zudem keine Zahl der an seinen Schulen tätigen Dolmetscher, sodass keine außenstehende Partei die Lücke messen kann.

New York regulates what an educational interpreter does and says nothing about who may do it. Section 200.1(nnn) of the Commissioner's regulations defines interpreting services as oral transliteration, cued language transliteration, sign language transliteration and interpreting, transcription services such as CART, C-Print and TypeWell, and special interpreting services for students who are deaf-blind. The definition ends there. It names no credential, no assessment score, no registry and no minimum level of skill, and the National Deaf Education Data Index found no Department guidance that supplies one.

Die Definition, die aufhört

The Index's New York state file, version 2.0, audited all 746 education agencies in the state: 685 operating districts, New York City as one unit, 37 BOCES, the eleven state-supported and chapter 1060 schools, the two state-operated schools and four state agencies. Its workforce block asks three questions of every state: what qualification the state requires of a K-12 educational interpreter, how many interpreters work in its schools, and where they are trained. New York answers none of them on the public record. The qualification is recorded as not found, the interpreter workforce as not published, and the preparation programs as a re-run target.



The population this leaves unprotected is not small. The State Education Department's count as of 2 October 2024 identifies 1,008 students under Deafness, 2,636 under Hearing Impairment and 28 under Deaf-Blindness. Not every one of those students uses an interpreter, and the count cannot say how many do. But every one who does is placed with an interpreter whose skill the state has never defined, and only 36 of the 746 agencies the Index read publish any interpreting service or interpreter at all.

Was eine Stellenausschreibung akzeptiert, wenn der Staat nichts festlegt

Where the state is silent, each employer writes its own floor, and the floor can sit very low. Capital Region BOCES, read on 12 October 2026, is recruiting a full-time, ten-month Educational Interpreter. The posting accepts any one of three routes: a bachelor's degree in an interpreter education program or a closely related field; an associate's degree in the same plus two years of interpreting experience; or a high school diploma or GED, four years of experience interpreting for deaf and hard of hearing people, and one college-level course in American Sign Language. It lists no certification. It does not mention the Educational Interpreter Performance Assessment, the Registry of Interpreters for the Deaf, or the National Interpreter Certification. The one screening it requires is a fingerprint background check.

None of those three routes measures whether the person can interpret. A degree shows coursework, years show employment, and a single ASL course shows that a course was taken. A district that hires through the third route has met every published requirement in New York while placing in a classroom someone whose interpreting has never been assessed by anyone. This is not a criticism of Capital Region BOCES, which published more than most. The Index found four other BOCES describing their own interpreters (Dutchess, Hamilton-Fulton-Montgomery under Co-Ser 324, Orange-Ulster under Co-Ser 714, and Monroe 1 under the title K-12 Educational Interpreter), and none of them prints a required credential either. The pattern is the state's, not the employer's.

Wie andere Staaten eine Untergrenze festlegen

Each of the states below writes its interpreter floor into law or rule; New York writes none. The five other states were audited in earlier releases of the Index, and each file cites the rule from the state's own code.

K-12-Educational-Interpreter-Untergrenzen in sechs Index-Staaten

Staat (Index-Datei)	K-12-Educational-Interpreter-Untergrenze	Wo sie festgelegt ist
Nebraska (27)	EIPA 4.0; 3,5 Bestandsschutz, 3,0 vorläufig	Rule 51, 010.06
Michigan (22)	EIPA 4.0 seit 1. September 2016; 3,5 für Vertretungen	R 393.5026 und 393.5027
Maryland (20)	EIPA-4.0-Fachlizenz für den Bildungsbereich, erlassen 2023; Einhaltung verschoben auf 1. Juli 2027	Lizenzierungsgesetz von 2023; Ch. 196 von 2026
Massachusetts (21)	Register geführt von der Commission for the Deaf and Hard of Hearing, EIPA 3,5	MCDHH-Register, 120 Registrierte 2025-26
Maine (19)	Staatliche Dolmetscherlizenz erforderlich	32 MRSA ch. 22; MUSER
New York (32)	Keine gefunden	8 NYCRR 200.1(nnn) definiert nur den Dienst

Quelle: National Deaf Education Data Index, Staatsdateien 19, 20, 21, 22, 27 und 32

The comparison is not flattering to the others in every respect. Maryland's standard was enacted and then paused under pressure from school boards and superintendents, and Nebraska exempts K-12 interpreters from its commission's licensure while setting the EIPA floor in education rule. A floor on paper is not a floor in practice. But each of those states has written down a number that a parent, an advocate or an audi-

tor can hold a district to. New York, with 3,644 students identified under Deafness or Hearing Impairment, has not.

Was die Datei sagen kann und was nicht

Der Index erfasst die Qualifikation als auf den gelesenen Seiten nicht gefunden, nicht als Abwesenheit im Gesetz, und dieser Unterschied ist wichtig. Ein Standard könnte in einem Rundschreiben des Departments, einem Feldratgeber oder einer Vertragsklausel stehen, die nicht öffentlich zugänglich ist. Falls einer existiert, ist er unveröffentlicht, und eine Anforderung, die ein Elternteil nicht finden kann, ist eine Anforderung, die ein Elternteil nicht durchsetzen kann. Der Korrekturweg steht dem Department zu denselben Bedingungen offen wie jedem anderen: ein Verweis auf eine Regel oder ein Leitliniendokument, das eine Untergrenze festlegt, würde den Befund in der nächsten Version ändern.

The gap is not new. A 2012 survey of state interpreter rules by the University of Northern Colorado recorded a call to New York City's Office of Sign Language Interpreting Services, which said the city had its own internal screening and that New York State had no standard. The city still runs that office, and it serves the largest single share of the population: 1,931 of the 3,644 identified students, or 53.0 percent, sit in the city. Whatever screening the city applies, it is the city's own, published nowhere the Index could read, and it does not reach the other 1,713 identified students who live in the rest of the state.

Die Akte kann auch nicht angeben, wie viele Dolmetscher an New Yorker Schulen arbeiten. Das State Education Department veröffentlicht keine Personaltabelle nach Berufsbezeichnung, und die bundesweite Section-618-Personaldatei für New York wurde in diesem Zyklus nicht ausgewertet. Damit bleibt ein Bundesstaat ohne veröffentlichte Mindestanforderung und ohne veröffentlichte Zahl, was bedeutet, dass keine außenstehende Partei sagen kann, wie viele Schüler von Dolmetschern betreut werden, die die Mindestanforderung keines anderen Bundesstaates in der obigen Tabelle erfüllen würden.

Was die Lücke schließt

The fix is one sentence of regulation and one table of data, and neither appears to need new legislation: Part 200 is the Commissioner's regulation, adopted by the

Board of Regents, and the table would be a Department publication. The first is a qualification added to Part 200: a minimum score on a named assessment for any person providing sign language interpreting under 200.1(nnn), with a grandfather period and a provisional tier so that districts are not left without staff overnight. Nebraska and Michigan have run tiered versions of that structure for years, and Maryland's pause shows what happens when the transition is not funded or phased: the standard is enacted and then deferred. The second is a count. The State Education Department already publishes students by disability and district through its SEDCAR files; a companion table of interpreters by district, with their credential level, would let anyone measure the distance between the students who need an interpreter and the interpreters who can serve them.

Until either exists, the burden falls on families. A parent of a deaf child in New York can ask the committee on special education, in writing, what assessment the assigned interpreter has passed and at what score, and can ask for the answer in the IEP. The district is not required by state rule to have an answer. That is the gap, stated as plainly as the file can state it: New York funds the service and defines the service, and on the public record it sets nothing about the person who delivers it. NDEDI's state release schedule is at ndedi.org.

Quellen

- National Deaf Education Data Index, New York state file version 2.0, SY 2025 (School Year 2024-2025), Novara Consulting Group LLC, DOI 10.5281/zenodo.23305369. Frame, coverage codes, workforce block, BOCES interpreter titles and the publication measure.
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- 8 NYCRR 200.1(nnn), definition of interpreting services, retrieved October 12, 2026.
- Capital Region BOCES, Educational Interpreter (FT/10M Position), job posting, retrieved October 12, 2026.
- University of Northern Colorado, OSEP Project 2014, state regulations: New York, dated March 2012.
- National Deaf Education Data Index state files 19 Maine, 20 Maryland, 21 Massachu-

setts, 22 Michigan and 27 Nebraska, version 1.0, for the interpreter rules in the comparison table.

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.

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Zitierweise

Grizzle, H. M. (2026, October 12). New York hat nie gesagt, wer dolmetschen darf. Novara Consulting Group. https://www.novaracg.com/de/2026/10/12/new-york-never-said-who-can-interpret/