

MARCH 13, 2014

Comments on: Raised Bill No. 5321 (LCO No. 468) *00468 HS *

"AN ACT CONCERNING INTERPRETER QUALIFICATIONS"

My name is James Cusack. I am a Sign Language Interpreter currently employed by the Department of Rehabilitation Services Interpreting Unit. I previously worked as an Interpreter for the Commission on the Deaf and Hearing Impaired. I have been so employed since 1990.

I would like to suggest that the present proposed bill needs some improvements before passage and implementation.

Section 1 (a) 8 (d): "...any business entity, within the state or through remote access, employing an interpreter...shall" comply with this law. This section seems to require that all interpreters working in Connecticut through out-of-state agencies and/or for Video Relay Service (VRS) telephone interpreting services, wherever they are located, must follow this Connecticut law, including registration with Department of Rehabilitation Services (DoRS), in order to provide services to people in the state of Connecticut. Perhaps this is partially dealt with in Section (a) 8 (j) (4).

How is it envisioned that the State of Connecticut will be able to enforce such requirement on interpreters and VRS providers located out of state?

Section 1 (a) 8 (e) (Legal Interpreting): While I am not sure of the experience and qualifications of the too few interpreters currently working for DoRS and other agencies in legal settings, I believe that not all of the current legal interpreters can meet the required "thirty hours of legal training" and "thirty hours annually of interpreting in legal situations".

Some would have no problem, but there may be some who cannot meet this requirement without a substantial additional expenditure of time and money. How many of the current competent legal interpreters would be *excluded* by this new law...at least for the present time? Is there any commitment on the part of the state to provide training and *work opportunities* (*i.e. thirty hours per year*) to all DoRS legal interpreters to allow them to meet these requirements? Would DoRS interpreters have to seek and accept free-lance assignments to maintain the 30 hour annual work requirement? Is there any commitment on the part of the state to provide training and work experience to allow interpreters to maintain qualification, or to allow *new* interpreters become qualified to interpret in "legal settings"?

If I may also note, the "thirty hours annually of interpreting in legal situations" for a legal interpreter to remain qualified to be so employed seems to exceed the requirement for Attorneys licensed to practice law in Connecticut. I believe that while continuing legal education is highly recommended, there is no requirement that an attorney licensed to practice law in Connecticut *must have* such continuing education, nor that he/she must actually *practice law* for any particular minimum number of hours annually in order to remain eligible to do so.

Section 1 (a) 8 (f) (Medical Interpreting): How many DoRS, or any other interpreters currently working in Connecticut, can provide the required "documentation of...a minimum of

thirty hours of medical interpreting training"? Maybe some, maybe many....maybe not so many.

I have been interpreting in "medical settings" for more than thirty years. I consider myself to be competent in that area. While I have taken some workshops that focused on Medical Interpreting, I doubt I can provide documentation of thirty hours of training in medical interpreting.

Among the requirements set forth in the present bill for both Legal and Medical interpreting, is the requirement that an interpreter hold "certification from the National Registry of Interpreters for the Deaf" (RID). Interpreters may be certified by RID at various levels, reflecting various levels of skill. The present law requires that, in order to interpret in Legal or Medical settings, an interpreter must hold CI and CT certificates. At the time the law was passed, these were the top level of certification, reflecting the top level of skill. The present bill reduces this requirement to *any* certification from RID, even those which *do not* reflect the top level of interpreting skill, thus, *lowering* the required minimum standard for interpreters.

Sections 1 (a) 8 (g) and (k) (Educational Interpreting): The requirements for interpreting in an "educational setting" require the completion of two educational units per year of "department approved training" for uncertified interpreters. Presumably, the "department" referred to here is, as in other sections of the bill, the Department of Rehabilitation Services. I am not aware of any structure or program of "department approved training", nor does the present bill propose any.

Section 2: While the Act is hyper-vigilant about the qualifications required to provide interpreting services in Connecticut, it seems to be silent about any sort of qualification to be a member of the proposed "Interpreting Standards and Monitoring Board", except that one be: a 1) "Deaf consumer", 2) "hard of hearing consumer", 3) "deaf-blind consumer", 4) "hearing consumer", 5) "interpreting professional", 6) "deaf professional", or 7) "interpreter trainer" (none of which is defined) and appointed by the Commissioner of Rehabilitation Services.

I would like to see some sort of knowledge, certification, and/or experience requirement attached to these potentially very powerful positions.

While this proposed law represents a somewhat Utopian ideal of how things *should be* in the world of sign-language interpreting, I am very much afraid that passing it in its present form, with no provision for a structure *and funding* for training and continuing improvement of interpreters, will result in an immediate and drastic reduction of the number of interpreters available to serve the community.

Respectfully Submitted,

James P. Cusack
59 Turkey Hill Road
Chester, CT 06412
(860) 944-2706