



## HEALTH LICENSING OFFICE

Tina Kotek, Governor

# Oregon Health Authority

1430 Tandem Ave. NE, Suite 180

Salem, OR 97301-2192

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**WHO:** Health Licensing Office  
Board of Sign Language Interpreters

**WHEN:** Wednesday, May 15, 2024, 10:00 a.m.

**WHERE:** 1430 Tandem Ave. NE, Suite 180, Salem, OR 97301

### What is the purpose of the meeting?

The purpose of the meeting is to conduct Board business. A copy of the agenda is provided with this notice. Go to <https://www.oregon.gov/oha/PH/HLO/Pages/Public-Meetings.aspx> for current meeting information.

### May the public attend open sessions in person?

Yes, members of the public, interested parties, and the media are invited to attend all board/council meetings. Public and interested parties' feedback will be heard if available and stated on the agenda.

### May the public attend by way of teleconference (call-in) or videoconference?

Yes, options to attend the meetings by teleconference or videoconference will be available through Zoom. See the options below:

Ways to attend:	How to attend the meeting: (If not attending in person, follow one of the options below)		
	Join By:	Meeting or Conference ID:	Passcode:
Zoom (audio/video)	<a href="#">Click here to join the meeting</a>	Meeting ID: 161 412 0308	696108
Zoom (audio only)	Dial (669) 254-5252	Conference ID: 161 412 0308	

### Instructions for attending:

- Email your full name to Carrie Edwards at [carrie.edwards@oha.oregon.gov](mailto:carrie.edwards@oha.oregon.gov), and let her know if you would like to make a public comment.

This agenda is subject to change. For the latest information, go to:  
<https://www.oregon.gov/oha/PH/HLO/Pages/Public-Meetings.aspx>

- The Health Licensing Office asks that individuals attending through Zoom keep their cameras off and their phones or microphones muted during the entire meeting until they are given an opportunity to comment during the Public and Interested Parties Feedback period.
- Representatives of the news media who are interested in attending an executive session are asked to contact Carrie Edwards at [carrie.edwards@oha.oregon.gov](mailto:carrie.edwards@oha.oregon.gov) to make arrangements.

### **Notification of recording:**

The meeting will be recorded. By attending this meeting, you consent to being recorded. The recording may include any information associated with you while attending the meeting, such as your voice, image, name, and phone number. The final video recording of the meeting will be posted to the Health Licensing Office YouTube Channel. By attending this meeting, you consent to the public display of any information associated with you in the video recording.

### **What if the board/council enters into executive session?**

Prior to entering executive session, the board/council chairperson will announce the nature of and the authority for holding an executive session. Board/council members, designated participants such as staff, and representatives of the news media shall be allowed to attend the executive session. All other audience members are not allowed to attend the executive session. Audience members attending the board/council meeting through Zoom phone or video will be in an electronic room separate from the board/council during executive session. Audience members may choose to disconnect during executive session and later rejoin the board/council meeting. Anyone joining the meeting while the board/council is in executive session will be placed in an electronic room separate from the board/council and rejoined when the board/council returns to open session. The board/council will return to open session before taking any final action or making any final decisions.

**What if the Health Licensing Office is unable to secure sign language interpreters for the public meeting?** HLO has requested three sign language interpreters, one being a Deaf sign language interpreter and CART captioning to attend the meeting. If the HLO is unable to secure at least two sign language interpreters within 48 hours of the meeting the meeting will be cancelled.

### **Who do I contact if I have questions or need special accommodations?**

If you have any questions about accommodations or need assistance to participate, please contact Carrie Edwards at [carrie.edwards@oha.oregon.gov](mailto:carrie.edwards@oha.oregon.gov), or by calling (503) 509-5622; or Derek Fultz at [derek.j.fultz@oha.oregon.gov](mailto:derek.j.fultz@oha.oregon.gov), or by calling (503) 373-1915. All relay calls are accepted.

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<https://www.oregon.gov/oha/PH/HLO/Pages/Public-Meetings.aspx>.

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# **Item for Board Action**

# **Approval of Agenda**



**Health Licensing Office  
Board of Sign Language Interpreters**  
1430 Tandem Ave. NE, Suite 180, Salem, OR 97301

**Wednesday, May 15, 2024, 10:00 a.m.**

- 1. Call to Order**
- 2. Items for Board Action**
  - ◆ Approval of Agenda
- 3. Meeting Accommodations**
- 4. Executive Session:** Pursuant to ORS 192.660(2)(f), ORS 192.355(9)(a) and ORS 40.225 for the purpose of considering information exempt from public disclosure. (legal advice)
- 5. Administrative Rule Discussion:**
  - ◆ ORS 676.750 to 676.789 (HB 2696 (2023))
  - ◆ Consider Hearings Officer Report – April 16, 2024
  - ◆ Consider Public Comment Received from April 1 to April 28, 2024
  - ◆ Draft Permanent Administrative Rules
    - Definitions
    - Board Conduct: Chairperson, Vice Chairperson & Duties
    - Exemptions, Exceptions and Extenuating Circumstances
    - License and Application Requirements
    - Supervision Training and Requirements
    - Code of Professional Conduct
    - Renewal Requirements
    - Settings: Legal, Medical, Education and Other
    - Specialty Licenses
    - Learner License
- 6. Working Lunch** (timing of lunch during the meeting may vary)
- 7. Items for Board Action –**
  - ◆ Possible Adoption of Permanent Rules
- 8. Reports**
  - ◆ Director Update
  - Board Member Update

- ◆ Licensing & Fiscal Statistics
- ◆ Policy
  - Health Care Interpreter Program - FAQ
  - Rules Advisory Committee Update
  - Department of Education
  - Rules Schedule Updates

## **9. Public/interested Parties' Feedback**

## **10. Other Board Business**

HLO has requested three sign language interpreters, one being a Deaf sign language interpreter and CART captioning to attend the meeting. If the HLO is unable to secure at least two sign language interpreters within 48 hours of the meeting the meeting will be cancelled.

# Executive Session



**Executive Session:** Pursuant to ORS 192.660(2)(f), ORS 192.355(9)(a), and ORS 40.225 for the purpose of considering information exempt from public disclosure. (legal advice)

# **Administrative Rule Discussion**



**Oregon Revised Statutes**  
**676.750 to 676.789**

1                                   **OREGON REVISED STATUTES**

2  
3                                   **SIGNED LANGUAGE INTERPRETERS**

4  
5   676.750   Definitions for ORS 676.750 to 676.789

6  
7   676.753   Supervisory sign language interpreter license

8  
9   676.756   Sign language interpreter license; renewal

10  
11   676.759   Provisional sign language interpreter license; renewal

12  
13   676.762   Educational sign language interpreter license; renewal

14  
15   676.765   Medical sign language interpreter license

16  
17   676.768   Legal sign language interpreter license

18  
19   676.771   Prohibition on unlicensed provision of signed language  
20                   interpretation services, use of title; exceptions

21  
22   676.774   Protection, disclosure of information acquired while providing  
23                   signed language interpretation services

24  
25   676.777   Discipline

26  
27   676.780   State Board of Sign Language Interpreters

28  
29   676.783   Board duties, powers; rules

30  
31   676.786   Health Licensing Office, Department of Education rules

32  
33   676.789   Criminal penalties

## SIGNED LANGUAGE INTERPRETERS

**676.750 Definitions for ORS 676.750 to 676.789.** As used in ORS 676.750 to 676.789:

(1) "Licensee" means an individual who holds a license issued under ORS 676.750 to 676.789.

(2) "Signed language interpretation services" means the interpretation of conversations and other communications by use of a visual signed language.

(3) "Sign language interpreter" means an individual who provides signed language interpretation services. [2023 c.414 §1]

**676.753 Supervisory sign language interpreter license.** (1) The Health Licensing Office may issue a supervisory sign language interpreter license to an applicant who:

(a) Is at least 18 years of age;

(b) Demonstrates compliance with the code of professional conduct authored by the Registry of Interpreters for the Deaf, or its successor organization, and the National Association of the Deaf, or its successor organization, and approved by the State Board of Sign Language Interpreters;

(c) Has at least three years of qualifying experience, as determined by the board;

(d) Meets the requirements established by the board relating to minimum qualifications, education or training or any combination thereof;

(e) Meets any other requirements established by the board; and

(f) Pays a fee established by the office.

(2) A licensed supervisory sign language interpreter:

(a) May not provide signed language interpretation services in a legal or medical setting without a license issued under ORS 676.765 or 676.768.

(b) May supervise licensed provisional sign language interpreters. [2023 c.414 §2]

**676.756 Sign language interpreter license; renewal.** (1) The Health Licensing Office may issue a sign language interpreter license to an applicant who:

(a) Is at least 18 years of age;

(b) Demonstrates compliance with the code of professional conduct authored by the Registry of Interpreters for the Deaf, or its successor organization, and the National Association of the Deaf, or its successor organization, and approved by the State Board of Sign Language Interpreters;

(c) Meets the requirements established by the board relating to minimum qualifications, education or training or any combination thereof;

(d) Meets any other requirements established by the board; and

(e) Pays a fee established by the office.

(2) A license issued under this section may be renewed twice.

(3) A licensed sign language interpreter may not provide signed language interpretation services in a legal or medical setting without a license issued under ORS 676.765 or 676.768. [2023 c.414 §3]

**676.759 Provisional sign language interpreter license; renewal. (1)**

The Health Licensing Office may issue a provisional sign language interpreter license to an applicant who:

(a) Is at least 18 years of age;

(b) Demonstrates compliance with the code of professional conduct authored by the Registry of Interpreters for the Deaf, or its successor organization, and the National Association of the Deaf, or its successor organization, and approved by the State Board of Sign Language Interpreters;

(c) Meets the requirements established by the board relating to minimum qualifications, education or training or any combination thereof;

(d) Meets any other requirements established by the board; and

(e) Pays a fee established by the office.

(2) A license issued under this section may be renewed up to five times.

(3) A licensed provisional sign language interpreter:

(a) May provide signed language interpretation services only under the supervision of a licensed supervisory sign language interpreter.

(b) May not provide signed language interpretation services in an educational, legal or medical setting without a license issued under section ORS 676.762, 676.765 or 676.768. [2023 c.414 §4]

**Note:** Sections 28 and 29, chapter 414, Oregon Laws 2023, provide:

**Sec. 28.** Notwithstanding sections 3 [676.756] and 4 [676.759] of this 2023 Act, a licensed sign language interpreter may supervise a licensed provisional sign language interpreter. [2023 c.414 §28]

1       **Sec. 29.** Section 28 of this 2023 Act is repealed on July 1, 2030. [2023  
2 c.414 §29]  
3

4       **676.762 Educational sign language interpreter license; renewal.** (1)  
5 The Health Licensing Office may issue an educational sign language  
6 interpreter license to an applicant who:

- 7       (a) Is at least 18 years of age;  
8       (b) Demonstrates compliance with the code of professional conduct  
9 authored by the Registry of Interpreters for the Deaf, or its successor  
10 organization, and the National Association of the Deaf, or its successor  
11 organization, and approved by the State Board of Sign Language  
12 Interpreters;  
13       (c) Meets the requirements established by the Department of Education  
14 by rule relating to sign language interpreters serving in schools;  
15       (d) Meets any other requirements established by the board; and  
16       (e) Pays a fee established by the office.

17       (2) A license issued under this section may be renewed up to five  
18 times.

19       (3) Only a licensed sign language interpreter, licensed supervisory sign  
20 language interpreter or licensed educational sign language interpreter may  
21 provide signed language interpretation services in an educational setting as  
22 defined by the board. [2023 c.414 §5]  
23

24       **676.765 Medical sign language interpreter license.** (1) The Health  
25 Licensing Office may issue a medical sign language interpreter license to  
26 an applicant who:

27       (a) Is a licensed supervisory sign language interpreter or a licensed  
28 sign language interpreter;

29       (b) Meets any requirements established by the State Board of Sign  
30 Language Interpreters; and

31       (c) Pays a fee established by the office.

32       (2) Only a licensed medical sign language interpreter may provide  
33 signed language interpretation services in a medical setting as defined by  
34 the board. [2023 c.414 §6]  
35

36       **676.768 Legal sign language interpreter license.** (1) The Health  
37 Licensing Office may issue a legal sign language interpreter license to an  
38 applicant who:

39       (a) Is a licensed supervisory sign language interpreter or a licensed  
40 sign language interpreter;

1 (b) Meets any requirements established by the State Board of Sign  
2 Language Interpreters; and

3 (c) Pays a fee established by the office.

4 (2) Only a licensed legal sign language interpreter may provide signed  
5 language interpretation services in a legal setting as defined by the board.  
6 [2023 c.414 §7]

7  
8 **676.771 Prohibition on unlicensed provision of signed language**  
9 **interpretation services, use of title; exceptions.** (1)(a) Except as  
10 provided in paragraph (b) of this subsection, a person who is not licensed  
11 under ORS 676.750 to 676.789 may not provide signed language  
12 interpretation services.

13 (b) A person who is not licensed under ORS 676.750 to 676.789 may  
14 provide signed language interpretation services:

15 (A) In circumstances in which a license issued under ORS 676.750 to  
16 676.789 is not required.

17 (B) In emergency situations involving imminent or immediate harm and  
18 during which a licensee is not available.

19 (C) In other extenuating circumstances, as determined by the State  
20 Board of Sign Language Interpreters.

21 (D) If the person is a qualified interpreter under ORS 45.288 or a court  
22 interpreter certified under ORS 45.291 providing signed language  
23 interpretation services for the purpose of a proceeding in the Supreme  
24 Court, Court of Appeals, Oregon Tax Court or a circuit court or at the  
25 direction or with the approval of the Chief Justice of the Supreme Court or  
26 the presiding judge of the court in which the proceeding occurs.

27 (2) A person who is not licensed under ORS 676.750 to 676.789 may  
28 not assume or use any title, words, abbreviations, signs or insignias,  
29 including but not limited to the titles “licensed supervisory sign language  
30 interpreter,” “licensed sign language interpreter,” “licensed provisional sign  
31 language interpreter,” “licensed educational sign language interpreter,”  
32 “licensed legal sign language interpreter” or “licensed medical sign  
33 language interpreter,” that indicate that the person is licensed to provide  
34 signed language interpretation services under ORS 676.750 to 676.789.

35 (3) For the purpose of providing signed language interpretation  
36 services, a person may not employ or contract with an individual who is not  
37 licensed to provide signed language interpretation services under ORS  
38 676.750 to 676.789. [2023 c.414 §8]

1       **676.774 Protection, disclosure of information acquired while**  
2 **providing signed language interpretation services.** A licensee who  
3 acquires any information protected by confidentiality, privilege or privacy  
4 laws while providing signed language interpretation services may not be  
5 required to disclose the information in an investigation, trial or other legal  
6 proceeding without the consent of the individuals for whom the signed  
7 language interpretation services were provided. [2023 c.414 §9]

8  
9       **676.777 Discipline.** In the manner prescribed in ORS chapter 183 for  
10 contested cases, and at the direction of the State Board of Sign Language  
11 Interpreters, the Health Licensing Office may impose a form of discipline  
12 listed in ORS 676.612 for a violation of ORS 676.750 to 676.789 or rules  
13 adopted under ORS 676.750 to 676.789. [2023 c.414 §10]

14  
15       **676.780 State Board of Sign Language Interpreters.** (1) There is  
16 established within the Health Licensing Office the State Board of Sign  
17 Language Interpreters consisting of seven members appointed by the  
18 Governor as follows:

19       (a)(A) Two members who are deaf, deafblind or hard of hearing and  
20 who represent an association in this state that promotes and protects the  
21 rights of persons who are deaf and hard of hearing;

22       (B) One member who represents a professional organization in this  
23 state for sign language interpreters and who holds a license issued under  
24 ORS 676.750 to 676.789;

25       (C) One member who represents a sign language interpreter education  
26 program at a post-secondary institution in this state and who holds a  
27 license issued under ORS 676.750 to 676.789;

28       (D) Two members who are hearing interpreters certified by or  
29 registered with a national organization for sign language interpreters and  
30 who hold licenses issued under ORS 676.750 to 676.789; and

31       (E) One member who is a deaf interpreter certified by or registered with  
32 a national organization for sign language interpreters and who holds a  
33 license issued under ORS 676.750 to 676.789.

34       (b) All members must be residents of this state and proficient in  
35 American Sign Language. To the extent practicable, the members must  
36 reflect the geographic and racial diversity of this state.

37       (2) The term of office of each member of the board is three years, but a  
38 member serves at the pleasure of the Governor. Before the expiration of a  
39 term of a member, the Governor shall appoint a successor whose term  
40 begins on January 1 next following. A member is eligible for reappointment.

1 If there is a vacancy for any cause, the Governor shall make an  
2 appointment to become immediately effective for the unexpired term.

3 (3) A member of the board is entitled to compensation and expenses as  
4 provided in ORS 292.495.

5 (4) The board shall select one of its members as chairperson and  
6 another as vice chairperson, for such terms and with duties and powers  
7 necessary for the performance of the functions of the office of chairperson  
8 and vice chairperson as the board determines.

9 (5) A majority of the members constitutes a quorum for the transaction  
10 of business.

11 (6) The board shall meet at least once each quarter as determined by  
12 the office. The board may also meet at other times and places specified by  
13 the call of the chairperson or of a majority of the members of the board.  
14 [2023 c.414 §11]

15  
16 **Note:** Section 27, chapter 414, Oregon Laws 2023, provides:

17 **Sec. 27.** (1) Notwithstanding the term of office specified by section 11  
18 of this 2023 Act [676.780], of the members first appointed to the State  
19 Board of Sign Language Interpreters:

20 (a) Two shall serve for a term ending December 31, 2024.

21 (b) Two shall serve for a term ending December 31, 2025.

22 (c) Three shall serve for a term ending December 31, 2026.

23 (2) The members who are required to hold a license under sections 1 to  
24 14 of this 2023 Act [676.750 to 676.789] shall obtain a license not later than  
25 January 31, 2024. [2023 c.414 §27]

26  
27 **676.783 Board duties, powers; rules.** The State Board of Sign  
28 Language Interpreters:

29 (1) Shall advise the Health Licensing Office in the establishment of:

30 (a) A publicly available registry of licensees that includes at least the  
31 names and specific license of each licensee.

32 (b) A process to receive and address grievances regarding licensees  
33 and signed language interpretation services.

34 (2) Shall adopt rules to carry out ORS 676.750 to 676.789, including  
35 rules to:

36 (a) Establish standards relating to minimum qualifications, education or  
37 training or any combination thereof for issuance of licenses under ORS  
38 676.750 to 676.789;

39 (b) Determine qualifications for renewal of licenses issued under ORS  
40 676.750 to 676.789;



1 (c) Establish supervision requirements; and  
2 (d) Establish a code of professional conduct for sign language  
3 interpreters licensed under ORS 676.750 to 676.789.

4 (3) May establish additional specialty licenses for sign language  
5 interpreters that the board determines necessary. [2023 c.414 §12]

6  
7 **676.786 Health Licensing Office, Department of Education**  
8 **rules.** The Health Licensing Office and Department of Education may  
9 adopt rules with the advice of the State Board of Sign Language  
10 Interpreters to carry out the office's and the department's duties under ORS  
11 676.750 to 676.789. [2023 c.414 §13]

12  
13 **676.789 Criminal penalties.** Violation of any provision of ORS 676.750  
14 to 676.789 is a Class C misdemeanor. [2023 c.414 §14]

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## EIPA PERFORMANCE TEST TURNAROUND TIMES

Dear EIPA Community,

We regret to inform you of a delay in the turnaround time for EIPA (Educational Interpreter Performance Assessment) tests. As of this notice, the turnaround time is approximately 7 months. We apologize for any inconvenience this may cause and want to express our sincere appreciation for your patience and understanding during this time.

As we approach our busiest testing season, spanning from May through July, we anticipate a further increase in demand for EIPA tests, potentially resulting in extended turnaround times beyond the current delay. We recognize the consequences of this extended turnaround time on interpreters, school systems, and Deaf/hard of hearing students. Thank you for your support as we work to address these challenges and improve our services.

We kindly ask licensing boards to take the extended turnaround time into consideration when reviewing interpreters waiting for test results. Your understanding and cooperation in this matter are greatly appreciated.

## NEW POLICY FOR RETAKING THE PERFORMANCE TEST

EIPA is instituting a new policy effective immediately. As of April 29, 2024, test candidates retaking the EIPA performance assessment must wait 1 calendar year (365 days) from the date of their most recent exam. This policy aims to manage demand, allow interpreters adequate time to make improvements in their skill set for a different score, and ensure fair access to testing opportunities for all candidates. When registering for a test, interpreters must make sure the new date is at least 365 days after the date of their most recent test. If a new registration is less than 365 days from a previous test date, the new registration will be cancelled. The cancellation policy and associated fees will apply.

We understand the importance of timely access to EIPA test results. Our team is committed to minimizing delays and optimizing our processes to provide the best possible service to interpreters, educational agencies, and Deaf and hard of hearing students.

EIPA recognizes that some interpreters may face job insecurity due to this new policy. Interpreters who are currently employed and working on a provisional license that will expire in the next 6 months may apply to take the test 6 months after the date of their last test. Please reach out to our team at [eipa@boystown.org](mailto:eipa@boystown.org) for further assistance if you meet this criterion.

Thank you for your ongoing understanding and cooperation as we navigate through this period of transition. Should you have any questions or concerns regarding this announcement, the new policy, or exception approval process, please don't hesitate to reach out to our team for assistance.

**From:** [Tammy Adams](#)  
**To:** [Patnode Samie](#); [Bothwell Robert](#)  
**Subject:** Fwd: Contact Us Form Entry TammyAdams  
**Date:** Monday, May 13, 2024 8:23:58 AM

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**Think twice** before clicking on links or opening attachments. This email came from outside our organization and might not be safe. If you are not expecting an attachment, contact the sender before opening it.

Samie and Bob,  
RID replied to my inquiry about metrics showing that the EIPA 4.0 would meet NIC certification requirements.

Please forward to the board.

Thank you  
Tammy

----- Forwarded message -----

**From:** **RID Certification** <[certification@rid.org](mailto:certification@rid.org)>  
**Date:** Mon, May 13, 2024, 7:58 AM  
**Subject:** Re: Contact Us Form Entry TammyAdams  
**To:** <[tammyadams95@gmail.com](mailto:tammyadams95@gmail.com)>

Hi Tammy,

We appreciate your email. The EIPA is an assessment, and alone is not considered a certification. RID is not the testing/issuing body of the EIPA assessment so we would not have any metrics or data on the EIPA assessment. RID previously conferred the Ed:K-12 certification based on an individual:

1. Satisfying RID's educational requirement for certification
2. Passing the EIPA written exam, and
3. Earning at least a 4.0 on the EIPA performance exam.

The Ed:K-12 certification is still recognized for those who were previously awarded that certification (as long as they are meeting the Certification Maintenance Program requirements), but is not currently being offered.

Hope this helps answer your questions.

Sincerely,  
Catie



333 Commerce Street  
Alexandria, VA 22314

(703) 838-0030  
[certification@rid.org](mailto:certification@rid.org)

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On Fri, May 10, 2024 at 5:40 PM [webmaster@rid.org](mailto:webmaster@rid.org) <[webmaster@rid.org](mailto:webmaster@rid.org)> wrote:

**Full Name**

Tammy Adams

**Email Address**

[tammyadams95@gmail.com](mailto:tammyadams95@gmail.com)

**Video/Voice Phone Number**

(503) 307-9293

**Is this a VP or Voice number?**

Voice

**Are you a member of RID?**

Yes

**If you are a RID member, please input your member number here. If you are not a RID member, please input 000000.**

31214

**What do you need help with today?**

Certification

**Certification - Sub Categories**

Certification Department

**Inquiry**

Hello,  
My name is Tammy Adams. I am trying to find information on the ED: K-12 certificate, the EIPA at a 4.0, and how it compares to the NIC. Many people are saying that an EIPA 4.0 is equal to passing the NIC. Do you have metrics or data to this effect? Where can I go to read any information that speaks to how the two tests compare?

Thank you  
Tammy Adams

**Timeline Agreement**

- Yes, I understand that it may take up to 5 business days to receive a response from RID.

# **Hearing Officer Report**

~

## **Verbal**



## HEALTH LICENSING OFFICE

Tina Kotek, Governor

Oregon  
**Health**  
Authority

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Website: [www.oregon.gov/oha/ph/hlo](http://www.oregon.gov/oha/ph/hlo)

DATE: May 15, 2024

TO: Board members

FROM: Samie Patnode, Policy Analyst and Hearing Officer:

SUBJECT: Presiding Hearing Officer's Report on Rulemaking Hearing and Public Comment Period

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### Hearing Officer Report

**Date of Hearing:** April 16, 2024, via Zoom or in-person

**Start time:** 10:10 a.m.

**End time:** 1:30 p.m.

**Purpose of Hearing:**

**Hearing Officer:** Samie Patnode

### Proposed Administrative Rule Citations

Adopt: 816-005-0000, 816-005-0010, 816-005-0020, 816-005-0030, 816-015-0000, 816-025-0000, 816-025-0020, 816-025-0020, 816-025-0030, 816-025-0040, 816-025-0050, 816-025-0060, 816-025-0070, 816-025-0080, 816-025-0090, 816-025-0100, 816-025-0110, 816-025-0150, 816-025-0160, 816-045-0000, 816-065-0000, 816-085-0000

## **Summary of Administrative Rules**

The rules allow the Health Licensing Office (HLO) to continue to license sign language interpreters under the regulation of the State Board of Sign Language Interpreters (Board). The Board was established within the HLO during the 2023 Legislative Session by passage of HB 2696. The rules make the Board operational by proposing Board approved minimum qualifications and licensing requirements for sign language interpreters in Oregon.

## **Summary of Public Comment**

**Written public comment:** From April 1 to April 28, 2024, at 12:00 p.m. the HLO received 45 written comments related to the proposed rules.

**Kaitlyn Oldham:** voiced concern regarding heritage interpreters having limited options to obtain a license. Examinations are being scheduled several months out and once an examination are administered it taking several months to obtain examination results. Applicants may not meet all requirements for a license by June 8, 2024, due to examination delays.

**Amber Qual, Rules Advisory Committee (RAC) member and full-time freelance interpreter:** All meetings should be held during times more accessible to the public for example weekends and evenings.

**Amber Qual provided comments for a K-12 interpreter:** The educational license should not be a steppingstone license limited to five-renewals.

**Nyssa Vaughn RAC member provided comments for an unknown person:** Licensure fees are too high. Patnode noted that there is a one-time application fee and initial license fee and an annual renewal fee for each license. Comment was provided that to obtain a SLI medical license a person should be required to hold a certification in American Sign Language (ASL) interpreting from the RID AND instead of OR pass the American Sign Language Proficiency Interview or the Sign Language Proficiency Interview with a minimum proficiency level of 4 or advanced.

**Joann Davis:** Staff clarified fee question noting the application fee is a one-time fee and the renewal fee is annual.

**Cristina Healy Freelance Interpreter:** Add annual continuing education requirements for an educational and generalist license when the applicant scores a 3.5 on the Educational Interpreting Performance Assessment (EIPA) Examination. Add exemptions for foreign signed languages, interpreters licensed in other states,

and interpreting in Oregon for less than 40 hours in a year (allowing Deaf consumers from other states to bring preferred interpreters for conferences, special events, etc.). Further define supervision.

**Luann Conner CODUS-Plus**, RID certified for 47-years: Deaf patients in Oregon will be greatly affected if Deaf interpreters are not available to provide interpreting to services most notably in medical settings. Many Deaf interpreters do not qualify for a license under the proposed rules. An example was provided on the training that CODUS-Plus requires if the Deaf interpreter is not RID certified. In 2023 CODUS-Plus employed 16 Deaf interpreters not certified through RID. In addition to standard interpreting services Deaf interpreters often provide overnight interpreting services in hospitals for Deaf patients to ensure patient advocacy and communication between the healthcare provider and patient. Deaf interpreters must have a way to work on June 8.

The rulemaking hearing was open for comment until 1:30 p.m.

All Board members were provided the written comments and the hearing video on May 2, 2024, by email.



# **Public Comment**

# Public comment letter

Wednesday Apr 24, 2024

On behalf of the Educational Interpreters and our administrator at Lane ESD (Eugene, OR), the following is our input regarding licensure rules.

- General/Supervisory Licenses
  - Remove “secondary” from the EIPA 4.0 requirements
    - The EIPA elementary test allows for a wider target consumer and the skills required are equal to those of the secondary test
    - The elementary test focuses on a higher level of idiosyncratic language due to the age of the consumers from the source materials
    - The vocabulary required has as wide a scope as the secondary test
    - The elementary interpreter’s role is one of a language model which requires a high level skill set
      - All of these skills needed are imbedded in the elementary EIPA test
- Generalist
  - Also be allowed to supervise interpreters who hold the proposed Speciality Training License in the educational setting.
- Educational License
  - The scope of this license should allow interpreters who hold the Educational License to interpret for any requested or open access school/district sponsored events where the Deaf/HH consumers may be children or adults.

- Will this license include the ability for ed interpreters to supervise/mentor interpreters with the Specialty Training License in the Educational Setting?
  - We propose it does
    - Allows interpreters to supervise in the educational setting, anyone holding the Specialty Training License on-site, direct supervision.
- Consider removing the renewal limits
  - Financial hardship for interpreters who want to only interpret in the educational setting if required to have Generalist/Supervisory License
    - Districts can structure systems to incentivise interpreters' skill development/growth
- Adoption of Supervisory Licensure
  - Experienced/Qualified interpreters who have been working in the educational setting for 5 or more years have been functioning as supervisors/mentors at their work sites. Previously there has not been a requirement for maintaining a 4.0 EIPA score for this job duty, thus many of these interpreters have not been required to hold a 4.0 and have not retaken the EIPA test since originally receiving the minimum OAR requirement of 3.5.
    - Therefore: there should be a grace period to allow experienced/qualified interpreters to continue this role to uphold the development of interpreting practices at their respective educational institutions until they receive a score of 4.0, bypassing the requirement of needing to maintain a score of 4.0 or equivalent for 3 or more years.
- Fees
  - License renewal fees too high

- OAR's require 12 PD hours which is an added expense to fulfill annually in addition to RID CEU's and other certifications as well as membership fees to various organizations

Memo

TO: Samie Patnode

FROM: Amanda R. Smith, Nationally Credentialed Interpreter

DATE: 4.20.2024

I am writing my commentary in response to the Proposed Rules for Sign Language Interpreter Licensing by the HLO.

I am a nationally certified interpreter, generalist and courtroom specific, and an interpreter educator of 17 years.

These are in chronological order as one reads the Proposed Rules. However, in terms of priority, I would rank them in importance as follows: #7, 3, 5, 6, and 8. The others are questions or editorial in nature.

### 1. The Fees do not match in this segment.

Supervisory license fees: application - \$ 150, initial and renewal license - \$ 200

Generalist license fees: application - \$ 100, initial and renewal license - \$ 150 (2 renewals)

Provisional license fees: application - \$ 75, initial and renewal license - \$ 100 (up to 5 renewals)

Educational license fees: application - \$ 75, initial and renewal license - \$ 100 (up to 5 renewals)

Medical license fees: application - \$ 50, initial and renewal license - \$ 50

Legal license fees: application - \$ 50, initial and renewal license - \$ 50

Specialty training license fees: application - \$ 50, initial and renewal license - \$ 50 (up to 5 renewals)

The license fees are larger than the hourly rate of many sign language interpreters and may negatively impact available funds of sign language interpreters. According to a recent survey of sign language interpreters the following estimates exist in Oregon:

K-12 Educational sign language interpreters earn \$ 25 to \$ 40 per hour depending on where the Interpreter is located in Oregon.

Post secondary educational sign language interpreters earn \$ 25 to \$ 60 per hour depending on if the educational institution is private or public.

Freelance or community sign language interpreters earn \$ 35 to \$ 70 per hour.

From the same survey results, the average sign language interpreter currently pays approximately \$ 1000 annually for certification and membership fees, continuing education, liability insurance, and testing for additional credentials annually.

doesn't match above

Specialty training license will allow students and individuals in rural communities to continue training while they work towards fulfilling licensing requirements. There will be a cost to the specialty license of \$ 100 initially and \$ 50 annually for up to 5 years. Without the license these individuals may not be able to complete their education or fulfill training requirements for other sign language interpreter licenses, which could negatively impact those individuals.

2. Under the “**definitions**,” I believe there should be an added definition of “the office” as it is used throughout and undefined. For example, in 816-005-0030 *Duties of the Officers and Board Procedures*
3. **REL 816-025-0030** (see screenshot below), the EIPA requirement should be listed as “EIPA 4.0 or above” and not include any distinction of what level or language choice.
  - a. Rationale - There is no distinction made in the OAR for Educational Interpreters, nor in the requirement for RID certification as Ed:k-12, thus we should not make a distinction in our rules.

**816-025-0030**

**Application Requirements for SLI Generalist License ¶**

¶

An individual applying for a SLI generalist license must:¶

(1) Meet the requirements of OAR 331 division 30.¶

(2) Submit a completed application form prescribed by HLO, which must contain the information listed in OAR 331-030-0000 and be accompanied by payment of all required fees pursuant to OAR 816-085-0000.¶

(3) Submit proof of being at least 18 years of age; documentation to prove age may include identification listed under OAR 331-030-0000.¶

(4) Submit proof of being in compliance with the 2005 NAD-RID Code of Professional Conduct listed under OAR 816-065-0000.¶

(5) Submit proof of holding a credential from one of the following:¶

(a) RID Certified Deaf Interpreter certification.¶

(b) RID National Interpreting Certification.¶

(c) RID National Interpreting Certification: Advanced.¶

(d) RID National Interpreting Certification: Master.¶

(e) RID Certificate of Interpretation.¶

(f) RID Certificate of Transliteration.¶

(g) RID Comprehensive Skills Certificate.¶

(h) RID Master Comprehensive Skills Certificate.¶

(i) RID Interpretation Certificate.¶

(j) RID Transliteration Certificate.¶

(k) NAD IV Level Certification.¶

(l) NAD V Level Certification.¶

(m) TBEI Advanced Certificate.¶

(n) TBEI Master Certificate.¶

(o) TBEI Trilingual Advanced Certificate.¶

(p) TBEI Trilingual Master Certificate.¶

(q) TBEI Level IV Certificate.¶

(r) TBEI Level V Certificate.¶

(s) TBEI Level III Intermediary Certificate.¶

(t) TBEI Level IV Intermediary Certificate.¶

(u) TBEI Level V Intermediary Certificate.¶

(v) EIPA Secondary Level PSE 4.0 or above.¶

(w) EIPA Secondary Level ASL 4.0 or above.

Statutory/Other Authority: ORS 676.756, ORS 676.759, ORS 676.783

Statutes/Other Implemented: ORS 676.750, ORS 676.756, ORS 676.783

4. **Clarification** question - The Educational License currently reads:

816-025-0050

Application Requirements for SLI Educational License ¶

¶

An individual applying for an SLI educational license must: ¶

(1) Meet the requirements of OAR 331 division 30.¶

(2) Submit a completed application form prescribed by HLO, which must contain the information listed in OAR 331-030-0000 and be accompanied by payment of all required fees pursuant to OAR 816-085-0000.¶

(3) Submit proof of being at least 18 years of age; documentation to prove age may include identification listed under OAR 331-030-0000.¶

(4) Submit proof of being in compliance with the 2005 NAD-RID Code of Professional Conduct listed under OAR 816-065-0000.¶

(5) Submit proof of meeting minimum standard requirements established by the Department of Education in OAR 581-015-2035. If OAR 581-015-2035 establishes an educational sign language interpreter license as the minimum standard, then this requirement is met if HLO finds that the applicant qualifies for licensure under this rule.¶

(6) Submit proof of meeting the following minimum standards: Attest to meeting the following minimum standards:¶

(a) Achieving a passing score of 3.5 or above on the EIPA Performance Test or holding RID National Interpreting Certification, RID Certificate of Interpretation or RID Certificate of Transliteration; and¶

(b) Holding a bachelor's or associate degree from an Interpreter Education Program or in a related educational field; or achieving a passing score on the EIPA Written test.

Statutory/Other Authority: ORS 676.762, ORS 676.783, ORS 676.786

Statutes/Other Implemented: ORS 676.750, ORS 676.762, ORS 676.783

This would make them qualified for Generalist and not need the Ed License

- a. If one had RID credentialing, they could get a generalist license and work in K-12, correct? They would not need an Educational License in addition to a Generalist? Thus only one license to have instead of 2?
5. **RE: 816-025-00700** *Application Requirements for SLI Medical License* there are actually no requirements that make this specifically medical in nature - meaning, the same as Generalist. What is the purpose or distinction of this license if there are not substantive requirements that make one uniquely qualified to work in medical settings?
  - a. Recommendation - add requirement to have completed and hold an OHA Healthcare Interpreter Certificate. OR a certain number of hours of medical interpreter training.
6. **RE: 516-025-0090** - *Application Requirement for SLI Legal License* 4a - A "qualified interpreter under ORS 42.588" is defined as "Qualified interpreter" means a person who is readily able to communicate with the person with a disability, interpret the proceedings and accurately repeat and interpret the statements of the person with a disability to the court." ([https://oregon.public.law/statutes/ors\\_45.285](https://oregon.public.law/statutes/ors_45.285))
  - a. How will this be documented and vetted by HLO as it is individually determined on a case by case basis?
  - b. Recommendation - Certified interpreter (as defined in supervisory)
7. **RE: 816-025-0110** *Application Requirements for SLI Provisional License* (see edits in screenshot below).



- a. (5a and b) EIPA 3.5 or above should be the wording with no differentiation made between levels and language choices (see #3 above).
  - b. (5c and d) The ASLPI and SLPI should be removed as they do not assess interpreting processes nor the two languages minimally required to perform interpreting services. Thus should not be included as evidence of ability to begin providing provisional services. It is not equivalent to the other measures listed.
  - c. (5h) NAD Level 3 can be removed as it is not a currently offered credential nor impacting any incoming applicants for this level.
8. There are a few **oversights** in these rules that need to be added or clarified:
- a. An exemption for out of state interpreters to come and work for a limited time per year (40-50 hours).
  - b. An exemption for interpretations that include foreign sign languages and/or foreign spoken languages.
  - c. These proposed rules do not include clarity about the meaning of “medical settings” or “legal settings” - thus there will be a lot of confusion and a need to fix this with future rules.
9. **Clarification** question -
- a. How do these rules impact volunteer interpreting services? For example, interpreting for a family birthday party or a golf game among friends, or other community based gatherings. These are situations where a student interpreter may be requested and not under the direct supervision of a supervisor/generalist licensed interpreter but rather overseen by the parties who invited them to interpret for the opportunity.



**From:** [Andrea Medlock](#)  
**To:** [Patnode Samie](#)  
**Subject:** Public Comment HB 2692 Proposed Rules  
**Date:** Sunday, April 28, 2024 11:21:17 AM

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It is critical for the rule making board of HB 2692 to consider and implement rules regarding out of state and remote interpreters.

Interpreters living in border cities like Vancouver, WA have several things to consider when making business decisions about working in Oregon. Currently commute time, traffic, income taxes, type of work assignment, availability of local interpreters, and interpreter skill set are among the many factors considered.

I live in Vancouver and avoid most general interpreting work in Oregon because of the factors above. Washington currently has a shortage of interpreters and I can keep my schedule very full in Washington. I do make exceptions and work in Oregon from time to time. I come across the bridge when I am specifically requested, when my skill set and experience fits an assignment well, for conferences, for non-profits and other reasons. I also volunteer or offer discounted rates for non-profits and individuals on a case by case basis.

I work in medical, legal, and most generalist settings. I regularly mentor new and student interpreters. I know many other Vancouver interpreters in this same situation.

The rate proposed for the 3 licenses I am required to hold to do business as usual in Oregon will make my infrequent assignments in Oregon unprofitable. If I decide not to obtain Oregon licensure, I would have to stop my pro bono/discounted work in Oregon. I fear this would hurt Deaf individuals, non-profits, and interpreter students in Oregon.

I would like a new, lower rate category to be considered for out of state interpreters who do 360 hours or less in Oregon.

Rules regarding remote and volunteer work also needs to be addressed by the rule making board. I am unclear at this time how licensure applies to these assignment types.

Andrea Medlock, BAS  
American Sign Language Interpreter  
RID (CI, CT) Certification of Interpretation and Transliteration  
WA- (AOC) Administration of the Courts provisional certification  
OR- (HCI) Health Care Interpreter  
OR- temporary licensed Supervisor, Medical, and Legal Interpreter

1317 SE Single Tree Dr

Vancouver, WA 98683

[https://www.credly.com/badges/b11464e8-b145-4879-b97e-f0ded34835ea/public\\_url](https://www.credly.com/badges/b11464e8-b145-4879-b97e-f0ded34835ea/public_url)

**From:** [Ashley Sisante](#)  
**To:** [Patnode Samie](#)  
**Subject:** SLI Licensure Proposed Rules - public comment  
**Date:** Sunday, April 28, 2024 11:46:28 AM

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Dear Board of SLI Licensure,

I am a nationally certified (RID) interpreter of 12 years. I work for Portland Public Schools as a K-12 interpreter. With my full time job and 2 young kids at home, I've been unable to follow the progression of the licensure rules closely. But I know many who have and they've shared their thoughts with me.

I'm writing to urge you to read **Melanie DeLeon's** submitted public comments very closely. She has a pulse on the Deaf and interpreting communities and has for longer than most of us in the field. She is smart, engaged, and has the best interests of everyone always at the front of her mind. If it were me trying to work out whether or not we were on the right track with licensure, it's Mel I would go to to guide me.

Thank you,  
Ashley Sisante

--

Ashley Sisante, MA, NIC, Ed:K-12  
Certified American Sign Language-English Interpreter

**From:** [Becky Oyerly](#)  
**To:** [Patnode Samie](#)  
**Subject:** SLI State Licensure  
**Date:** Thursday, April 25, 2024 9:48:31 AM

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To Whom It May Concern,

My name is Becky Oyerly and I am a Child of Deaf Adults (CODA). I have been interpreting professionally for more 32 years in Southern Oregon. In 2008, I passed the EIPA Primary/Elementary Assessment with a score above 4.0 and was awarded RID Certification (RID ED:K-12). I have proudly maintained my certification with hard work.

Most of my career has been in the K-12 education setting, but I also have a plethora of experience in community interpreting. I have interpreted weddings, funerals, DHS, court/legal, medical and for a former president of the United States. For the last 6 1/2 years I have also been doing Video Relay Service interpreting.

I appreciate the State of Oregon taking a stance requiring ASL Interpreters be licensed and qualified. I also appreciate the opportunity to voice concerns to the RAC and be heard. As interpreters, we are responsible to provide communication access to Deaf, Hard of Hearing and Deaf-Blind (D/HOH/DB) individuals in society ensuring these consumers have access to and clear understand what is being communicated amongst them. This being said, I do have some strong concerns about some of the qualification requirements as they currently stand, the lists of certifications currently being accepted to become licensed and the renewal timeline and requirements.

First, on each of the SLI License applications there is a list of accepted certifications from RID. Every certificate that RID issues/recognizes is listed EXCEPT for the RID ED:K-12 certification.

**Please specifically list the RID ED:K-12 certification in the same manner the others are recognized on each and all of the SLI License requirement lists because it is an RID Certification that shows qualification and a high level of skill.**

Secondly, on each of the license applications there is a list of accepted assessments. At this time. In regard to the EIPA Assessments, only the EIPA ASL/PSE SECONDARY 4.0 or Higher is recognized. EIPA ASL/PSE **PRIMARY** 4.0 or Higher **is not** recognized. I believe this should be added as a qualifying assessment to the list of accepted qualifications because it tests and measures the same exact parameters and skill sets that the EIPA SECONDARY assessment measures. Interpreting for a population with a lower language ability is more challenging than not.

**Please remove the wording “Secondary” from the EIPA Secondary 4.0 or above” in order to include those interpreters with an EIPA Primary/Elementary 4.0 or**

**higher**

Third, the application for the SLI Medical License lists that, along with either a Supervisory or Generalist License and other requirements, one must have a "Certification in ASL interpreting from the RID or.....". While the RID ED:K-12 satisfies the "Certification in ASL interpreting from the RID or..." part, it DOES NOT satisfy the Supervisory or Generalist requirement because it is simply not listed/recognized as an accepted certification. Therefore, a person would not be able to apply for any of the 3 licenses because to qualify for the Supervisory or Generalist license you must have one of the certificates listed on the qualification lists. **Please specifically recognize the RID ED K12 as a qualification for both General and Supervisory SLI Licensure.**

Lastly, in regard to SLI License Renewals-

**Generalist License:** I do not believe it should be a requirement for someone who has a Generalist License to renew to a Supervisory License. Not all interpreters want/need to take on that role.

**Educational License:** Some Interpreters are not interested in doing freelance/community interpreting and are content working only in education. These interpreters should not be forced to renew after a certain amount of time into a Generalist license. I do agree that Educational Interpreters should have to keep up their professional development time by providing documentation using Certificates of Completion if they are not RID ED:K-12 certified. This should be required to prove that a person still maintains the skills necessary for the educational interpreting environment.

I appreciate the opportunity to offer feedback and hope that concerns with this law and the requirements for licensure are addressed. We will not have enough Supervisory Licensed interpreters to oversee the special training Licenses on site and this will negatively impact students in K-12 settings. If there are any questions I can answer, please reach out to me anytime!

Respectfully,

Becky Oyerly

RID Ed-K:12

541.779.5197

[beckyoyerly@gmail.com](mailto:beckyoyerly@gmail.com)

State Board of Sign Language Interpreters  
c/o Samie Patnode  
Health Licensing Office  
1430 Tandem Ave. NE, Suite 180  
Salem, OR 97301-2192  
[samie.patnode@oha.oregon.gov](mailto:samie.patnode@oha.oregon.gov)

## **Re: Proposed Rulemaking - OAR 816**

Dear Board of SLI Licensure,

My name is Christina Healy. I am an RID certified freelance interpreter in Oregon, and I am submitting public comment on the proposed rules for ASL interpreter licenses in the state.

Thank you for your thoughtfulness and thorough deliberation in balancing the widely varied needs of all stakeholders of interpreting services in our state. I generally support the recommendations of the Board, and I have some suggestions on subsequent pages for consideration at your May 15th meeting before approving the permanent rules.

In brief, I recommend:

- adding a CEU requirement for those qualified by an EIPA performance score (Ed and Generalist licenses).
- adding an exemption for:
  - foreign signed languages,
  - interpreters licensed in other states, and
  - interpreting in Oregon for less than 40 hours in a year  
(allowing Deaf consumers from other states to bring preferred interpreters for conferences, special events, etc.)
- defining "supervision" with example practices beyond on-site direct supervision for those holding a provisional license.

Thank you again for all of your hard work!

Christina Healy Collister  
CI&CT, Ed:K-12, OHCI  
[c.healy03@gmail.com](mailto:c.healy03@gmail.com)  
503-998-3101 (v/txt/ft)

## Comments

**816-025-0050 Section 6.a. — This proposed rule states that an individual applying for an SLI educational license must submit proof of “Achieving a passing score of 3.5 or above on the EIPA Performance Test or holding RID NIC, CI, or CT certification.”**

**and**

**816-025-0030 Section 5.v-w — This proposed rule also uses EIPA scores for qualification**

Recommendation:

I recommend adding that if the interpreter qualifies by earning a minimal score on the EIPA Performance assessment, that the interpreter also demonstrate 10 hours of annual continuing education relevant to interpreting work.

Rationale:

This requirement parallels the average 20 hours of CEUs required for certification maintenance for the NIC, CI, and CT. The lower hour requirement recognizes the barriers that may be faced by interpreters who work exclusively in educational settings.

An example wording for -0050 might say: **“Achieving a score of 3.5 or above on the EIPA Performance test and completing 10 hours of continuing education related to providing interpreting services, or holding a current NIC, CI, or CT from RID.”**

**816-015-0000 Emergency Care and Exceptions — The proposed rules make exceptions for emergencies, conflicts with federal law, and interpreters already qualified for court proceedings by other Oregon regulations.**

Recommendation:

I recommend adding three more exemptions to address concerns voiced amongst our colleagues, consumers, agencies, and the RAC and Board: foreign signed languages, inter-state reciprocity, and out-of-state preferred/designated interpreters for a special event.

Here is some recommended language for those exemptions:

- 1. These rules are meant to regulate ASL interpreters. Nothing in these rules is meant to regulate individuals providing services for users of foreign signed languages (such as Japanese Sign Language, Russian Sign Language, Korean Sign Language, etc.).**

**2. Sign language interpretation services may be provided by a person who holds a sign language interpreting license from another state.**

[I recommend this exception be included simply and broadly for now, and in the future the Board can amend it to be more particular based on stakeholder experience and feedback.]

**3. These rules are meant to regulate ASL interpreters who primarily provide services in Oregon. Sign language interpretation services may be provided by a person who does not live in Oregon for a specific event for a cumulative number of hours not to exceed 40 hours in one calendar year.**

[I recommend creating some kind of exception like this and amending in the future as needed. A few states still do not have licensure, so this would cover interpreters from those states if needed.]

Rationale:

This exception would allow Deaf people from other states to bring preferred/ designated interpreters to accompany them at conferences, trainings, or special events for a week without requiring the interpreter to pay for and await the process for an Oregon license. It also would eliminate the burden for HLO to license a small number of interpreters who might enter the state only temporarily.]

**676.783 Board duties, powers; rules. The State Board of Sign Language Interpreters: (1) Shall advise the Health Licensing Office in the establishment of: ... (c) Establish supervision requirements**

Recommendation:

I recommend the Board provide a non-comprehensive list of supervision activities for holders of the Provisional License.

Wording might look like:

**Supervision for holders of a Provisional License may include a variety of practices, including but not limited to:**

- accompaniment for provision of interpreting services as mentor or as co-interpreters (shadowing or teaming),
- reviewing recorded work samples together,
- consultation before acceptance of an interpreting assignment,
- preparing for upcoming interpreting assignments,
- debriefing interpreting assignments,
- preparation for assessments or tests of interpreting skills,



- **discussing interpreting related books, articles, workshops, or other professional development,**
- **other activities requested by the Provisional License holder, and agreed to by the supervisor to increase the likelihood for a Generalist License to be acquired by the Provisional License holder.**

State Board of Sign Language Interpreters  
c/o Samie Patnode  
Health Licensing Office  
1430 Tandem Ave. NE, Suite 180  
Salem, OR 97301-2192  
[samie.patnode@oha.oregon.gov](mailto:samie.patnode@oha.oregon.gov)

**Re: Proposed Rulemaking - OAR 816-025-0070 - SLI Medical License**

Dear Board of SLI Licensure,

My name is Christina Healy. I am an RID certified freelance interpreter in Oregon, and I am submitting public comment on the proposed rules for ASL interpreter licenses in the state.

I have shared other comments in a previous letter, and I am writing again to recommend Provisional License holders be allowed to work in educational settings, and in more detail about the SLI Medical License criteria. Thank you again for all of your hard work!

Christina Healy Collister  
CI&CT, Ed:K-12, OHCI  
[c.healy03@gmail.com](mailto:c.healy03@gmail.com)  
503-998-3101 (v/txt/ft)

Public Comment #1 - Allow Prov. Lic. holders to work in Educational settings

**816-025-0100 (f) Stipulates that a holder of the SLI Provisional License may not provide SLI services in an educational setting without also holding the specialty Ed license.**

I recommend removing (f) from this rule to allow holders of the Provisional License to work in community and educational settings with supervision.

Public Comment #2 - Update Med. Lic. criteria to relevant qualifications

**816-025-00570 Section 4 states that an individual applying for an SLI Medical License must submit proof of (a) RID Certification or (b) ASLPI/SLPI level IV/ advanced, respectively.**

I recommend both of these requirements be removed and be replaced by criteria relevant to providing interpreting services in medical settings.

**Alternative Proposed Rule**

In the paragraphs below, I provide rationale for removing the current criteria, and I urge against using the HCI criteria as a model for designing the SLI Medical License.

Instead I recommend the Board assign criteria similar to the SLI Legal License proposed rules, making the criteria relevant to medical settings, such as the following:

**In addition to holding the SLI Generalist or Supervisory License, an applicant for a SLI Medical License must submit:**

- a) A current HIPAA training certificate,**
- b) A current Blood Borne Pathogens training certificate, and**
- c) Attest to having completed 20 hours of education on health care interpreting or medical topics, or attest to holding one of the following credentials:**
  - (i) Oregon Health Care Interpreter Certification (OHCI)**
  - (ii) Core Certification Commission Healthcare Interpreter (CCHI)**
  - (iii) Qualified Mental Health Interpreter Certification (QMHI)**

I believe criteria like this would better serve the health and safety of the public, while not enacting undue and irrelevant burdens on interpreters and HLO staff.

## Rationale for Public Comment #2

### **A. Redundancy Problem of Part (a)**

Section 3 of this rule already requires that the person hold either the Generalist or Supervisory License, so requiring RID Certification is redundant given that those licenses already require that certification or an equivalent. Part (a) does nothing to specialize this person for work in medical settings and should be removed.

### **B. Irrelevancy Problem of Part (b)**

The ASLPI and SLPI assessments are related neither to interpreting nor to the medical field. Advanced fluency in ASL is required for providing interpreting services to *certain* patients and for *particular* procedures, but this license is meant to allow interpreting services in all medical settings to all relevant patients. Advanced ASL is not required for interpreting most routine care appointments for many DHHDB patients in Oregon.

The ASLPI/SLIP assess a person's grammatical use of ASL — in contrast to disfluency, but also in contrast to English-influenced syntax and lexical choices. Many DHHDB patients in Oregon prefer SLI services using varieties of ASL that provide clear communication for them, but which would score below a IV/ advanced on these assessments due to English influence. Excluding interpreters who providing SLI services with English-influenced ASL varieties would harm DHHDB patients who are best served by these interpreters.

Furthermore, neither the ASLPI, nor the SLIP evaluates an individual's command of medical terminology in ASL, nor how one is able to convey medical information between ASL and English. These assessments are wholly irrelevant to interpreting and to medical settings, so part (b) should be removed.

### **C. Problematic use of OAR 950-050 as a Model**

I understand these standards were inspired by OHA's law requiring medical providers to prioritize working with OHA certified interpreters. I warn against that, since that law was originally drafted with spoken-language interpreting services in mind, and it is likely not an appropriate model to guide standards for SLI licensure.

The law about OHA qualified interpreters requires health care providers (doctors and clinics) to *first* seek interpreters on the HCI list, but they often end up hiring interpreters that are not on that list. The SLI Medical License should be more broad than the HCI, enabling interpreters who are not interested in joining that list to continue providing services in medical settings.

As the interpreters on the Board are aware, spoken language interpreting services for community interpreting (as opposed to conference interpreting) is dramatically different than those provided by signed language interpreters. Additionally, the HCI law does not cover all medical interpreting settings:

- The HCI law applies only to health care providers that are reimbursed with public funds.
- It provides an exemption in the case that a patient has a preferred interpreter who does not hold the HCI certification.
- It requires the health care provider *seek* an OHA certified interpreter first, but if one is not available, they may work with interpreters who are not on the HCI list.

For all of these reasons, I urge the Board not to design the SLI Medical License based on the HCI criteria, and instead consider what criteria identifies a person as qualified to provide SLI services in medical settings for the vastly diverse DHHDB patient population in Oregon.

**From:** [chrishood@aol.com](mailto:chrishood@aol.com)  
**To:** [Patnode Samie](#)  
**Subject:** Feedback Oregon Licensure  
**Date:** Thursday, April 18, 2024 8:24:59 PM

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**Think twice** before clicking on links or opening attachments. This email came from outside our organization and might not be safe. If you are not expecting an attachment, contact the sender before opening it.

To Whom it May Concern:

I am writing to express my concerns about the proposed licensure requirements and fees.

I have been interpreting for 37 years. I currently work predominantly in the VRS setting but have worked full time as a community interpreter and as an educational interpreter, k-12, college, university.

I graduated from an itp in Wisconsin, spent the majority of my career in Michigan, and the past ten years in Oregon. Michigan had instituted their own licensure before I moved here. They charged interpreters \$30 ten years ago, they charge interpreters \$30 now.

How is Oregon rationalizing this undue burden on its interpreters? Exactly how much

money per year do they think the average interpreter earns? Do I understand this correctly?

\$350 yearly for Oregon Licensure In addition to:

\$220 for RID Membership. \$45 for ORID membership. \$40 for NAD membership. \$75 for NAIE membership.

\$25 for NAOBI membership

\$130 CIT Membership

Hundreds in testing fees for RID/CASLI  
\$800

EIPA written \$250

EIPA performance \$350

ASLPI \$195

Travel expenses to take all these tests. \$\$\$\$

Student loans for degrees. Books and videos.

Paid mentoring.

80 hours of Continuing Education Units per RID CMP cycle to maintain certification—approximately \$1000—so at least \$200 per

year.

60 hours specialized Medical CEUs

Specialized Legal CEUs

Specialized Educational CEUs

PPO CEUs

Expenses for physical therapy, massage therapy, mental health therapy/self care.

What is the purpose of making someone you have registered as a Supervisor Interpreter, who has RID/NAD certification and many years of experience take another test to measure sign language proficiency. It feels like a duplication of effort and a money grab. How is this viable or sustainable?

At this stage in my career, over 55 years old, with 37 years in, I cannot work 60 hours per week to foot all these fees!!!

RID and other orgs offer senior rates. I have heard no mention of that from Oregon!

These undue financial burdens and requirements will drive interpreters from the state and from the field.



Please give this careful consideration before the already existing interpreter shortage is exacerbated.

Sincerely,  
Christine Alexander  
NIC, NADIV, EIPA Elem/Sec

[Sent from the all new AOL app for iOS](#)

**From:** [christine kanta](#)  
**To:** [Patnode Samie](#)  
**Subject:** ASL Interpreters in medical settings  
**Date:** Sunday, April 28, 2024 8:46:23 AM

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Hello,

My name is Christine Kanta and I am a Deaf person and ASL user. I rely on ASL interpreters for many things including medical appointments and emergencies.

Your proposed rule will make it extremely difficult and oftentimes impossible for medical facilities to find available ASL interpreters.

I am **STRONGLY AGAINST** this proposed rule. If you value my life and the lives of those in my community, you will too.

Christine Kanta

**From:** [Cindy Chambers](#)  
**To:** [Patnode Samie](#)  
**Subject:** Cost for License  
**Date:** Wednesday, April 3, 2024 8:37:27 AM

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Hello,

When we originally heard of educational interpreters being licensed, it was proposed "one time at our hourly rate". This is almost three times the rate.

If we must be licensed, I would hope it would be a more acceptable cost considering all of the other costs interpreters need to pay in order to be qualified to work.

Thank you for your time,

Cindy

**From:** [Cynthia Wallace](#)  
**To:** [Patnode Samie](#)  
**Subject:** Oregon Licensure Proposed Rules  
**Date:** Sunday, April 28, 2024 11:55:46 AM  
**Attachments:** [License Fees USA January 2024.xlsx](#)

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Hello!

I am writing to give feedback regarding Oregon licensure proposed rules.

Some of the names of the licensure types are confusing.

1. Specialty Training License.

This license is listed as specifically for students or trainees. I believe the term. “ Specialty” is misleading.

I would like to suggest that this be called either a “Student License” or a “Trainee License”. Changing the title of this particular license would Anybody working with that interpreter that they are not a full-fledged Interpreter.

Interpreters working without proper credentials, has been an ongoing problem within our profession. Changing the title of this particular license would go a long way to prevent that.

2. Provisional License

In other states that have licensure Provisional License is a term used for interpreters coming into the state to interpret temporarily. The states that have these define it in a variety of ways. But the provisional license is used for someone who does not live in a state and works occasionally in the state.

Therefore, I believe that the title of provisional license being used for an interpreter who does not have certification is not appropriate. While I believe that interpreters need places to practice their craft in order to improve. I believe there should be a different term used for this type of interpreter so they do not get confused for someone who has more experience.

I see that the Mentor (for a for a provisionally licensed interpreter) does not have to provide mentoring in person. I see that this is in red so I assume that means it is written into the law. I believe this is also not appropriate. A new Interpreter not yet certified, in my opinion, should only be working with an in person mentor.

I also see that the provisional License can be renewed every six years up to six times. This is potentially 30 years of being a provisionally licensed Interpreter. If an interpreter cannot get certified, ie. credentialed in their field within 2 to 6 years, I question their skills and commitment to their craft. Please change this to a more appropriate time frame.

3. Educational License

I believe that educational Interpreting specifically K-12 Interpreting should be done by

interpreters who are native speakers of ASL. I encourage you to rethink this category and perhaps influence our profession and the experience of deaf children. I propose that K-12 Interpreting should only be done by Deaf/Hearing interpreter teams.

When deaf children have interpreters in their classroom, those interpreters become the for deaf children. Native speakers of ASL, specifically Deaf interpreters, should be the language models for all children.

I encourage you to take a radical step in the education of Deaf children. Changing how Interpreting happens on the K-12 level will prevent much of the language deprivation that happens for Deaf children.

As a side-note , I don't believe any Interpreter who has only passed the EIPA written exam should be allowed to interpret in a classroom

#### 4. Fees

The fees for all categories of interpreters are exorbitant. I have already heard from many of my colleagues hearing and Deaf that they will no longer provide Interpreting services for Oregon State due to the exorbitantly high fees

Please read the attached that I made showing the fees of all states who have licensing fees. Oregon's fees are much higher than any other state.

There are three tabs. One tab shows all states including those that have no interpreting license requirements.

The second tab shows only states with licenses and enumerates those license fees.

The third tab is an analysis of the details of licensure and how it impacts Oregon interpreters.

Thank you for considering my feedback.

If you have any questions, please feel free to contact me directly, my contact information below.

Cynthia

**Cynthia Fein-Wallace,**  
**CI/CT/SC:L/CoreCHI™/OCHI**  
*Cynthia Fein-Wallace Interpreting Services,*  
*ASL Interpreter/Consultant/Owner*  
*Email: cyfeinwallace@gmail.com*  
*Phone/Text: 206•617•8427*

# Licensing / Registration Fees

	A	B	C	D	E	F	H	K	L
1	STATE	CREDENTIAL REQUIRED	SEPARATE APPLICATION FEE	INITIAL FEE (FIRST YEAR)	DURATION	RENEWAL FEE	SPECIALITY FEE: MEDICAL	WEBSITE	ADDITIONAL INFORMATION
2	ALABAMA	License	No	\$225.00	1-Year	\$175.00	None	<a href="https://albit-search.kalmservices.net/">https://albit-search.kalmservices.net/</a>	
3	ALASKA	NONE							
4	ARIZONA	License	No	\$125.00	1-year	\$50.00	None	<a href="https://www.acdhh.org/media/2987/list-of-terps-may-20-2022.pdf">https://www.acdhh.org/media/2987/list-of-terps-may-20-2022.pdf</a>	
5	ARKANSAS	License	No	\$5.00	1-year	\$4.00	None	<a href="https://www.healthy.arkansas.gov/images/uploads/pdf/Active_Interpreters.pdf">https://www.healthy.arkansas.gov/images/uploads/pdf/Active Interpreters.pdf</a>	A note on their website states "Reduced application fees for 2024 license year"
6	CALIFORNIA	NONE							
7	COLORADO	Certification Recognized							No fees applied for certification recognition.
8	CONNECTICUT	Registry	No Fees		Ongoing		None	<a href="https://www.portal.ct.gov/aginganddisability/content/pages/programs/deaf-and-hard-of-hearing-interpreter-registry">https://www.portal.ct.gov/aginganddisability/content/pages/programs/deaf-and-hard-of-hearing-interpreter-registry</a>	
9	DELAWARE	*NONE						<a href="https://legis.delaware.gov/BillDetail/89292">https://legis.delaware.gov/BillDetail/89292</a>	*Registration Act in Progress
10	FLORIDA	NONE							
11	GEORGIA	NONE							
12	HAWAII	NONE						<a href="https://health.hawaii.gov/dcab/files/2022/02/February2022Update.pdf">https://health.hawaii.gov/dcab/files/2022/02/February2022Update.pdf</a>	
13	IDAHO	License	\$25.00	\$70.00	1-year	None	None	<a href="https://apps.dopl.idaho.gov/DOPLPublic/LPRBrowser.aspx">https://apps.dopl.idaho.gov/DOPLPublic/LPRBrowser.aspx</a>	
14	ILLINOIS	License	\$50.00	\$175.00	1-year	\$150.00	None	<a href="https://www2.illinois.gov/idhhc/licensure/Pages/DirectoryHome.aspx">https://www2.illinois.gov/idhhc/licensure/Pages/DirectoryHome.aspx</a>	
15	INDIANA	NONE							
16	IOWA	License	No	\$120.00	1-year	unknown	None	<a href="https://amanda-portal.idph.state.ia.us/ibpl/portal/#/license/license-query">https://amanda-portal.idph.state.ia.us/ibpl/portal/#/license/license-query</a>	
17	KANSAS	Registration			None	None	None	<a href="https://kcdhh.ks.gov/communication-services/interpreting-services">https://kcdhh.ks.gov/communication-services/interpreting-services</a>	
18	KENTUCKY	License	No	\$175.00	1-year	\$125.00	None	<a href="https://oop.ky.gov/active_lic_dir.aspx">https://oop.ky.gov/active_lic_dir.aspx</a>	

	A	B	C	D	E	F	H	K	L
19	LOUISIANA	NONE							
20	MAINE	License	No	\$200.00	1-year	\$200.00	NONE	<a href="https://licensing.web.maine.gov">https://licensing.web.maine.gov</a>	Fees fluctuate. Must complete application to learn fees. Deaf interpreters initial fee \$100.00
21	MARYLAND	NONE							Licensure is in planning stages. Current plan is to institute licensure in 2025
22	MASSACHUTTES	NONE							
23	MICHIGAN	Certification Verification	No	\$30.00	1-year	\$30.00	None	<a href="https://interpreter.apps.lara.state.mi.us/">https://interpreter.apps.lara.state.mi.us/</a>	
24	MINNESOTA	NONE							
25	MISSISSIPPI	Registration	No	\$25.00	2-year	\$25.00	None	<a href="https://www.odhh.org/interpreter-registration/interpreters/">https://www.odhh.org/interpreter-registration/interpreters/</a>	
26	MISSOURI	License	No	\$60.00	1-year	\$60.00	None	<a href="https://pr.mo.gov/interpreters.asp">https://pr.mo.gov/interpreters.asp</a>	
27	MONTANA	NONE							
28	NEBRASKA	License	No	\$150.00	2-years	\$150.00	None	<a href="https://ncdhh.nebraska.gov/sites/ncdhh.nebraska.gov/files/doc/Licensed%20Interpreter%20Roster%204.11.2022.pdf">https://ncdhh.nebraska.gov/sites/ncdhh.nebraska.gov/files/doc/Licensed%20Interpreter%20Roster%204.11.2022.pdf</a>	
29	NEVADA	Registration	No		1-year	None	None	<a href="https://nvir.certemy.com/public-registry/1bd856a7-477b-4d87-89d5-a1f8d84703cf">https://nvir.certemy.com/public-registry/1bd856a7-477b-4d87-89d5-a1f8d84703cf</a>	Proof of certification required for registration with the state. No fees for registration.
30	NEW HAMPSHIRE	License	\$50.00	\$150.00	3-years	\$175.00	None	<a href="https://www.education.nh.gov">https://www.education.nh.gov</a>	
31	NEW JERSEY	NONE							
32	NEW MEXICO	License	No	\$65.00	2-years	\$50.00	None	<a href="http://verification.rld.state.nm.us/Search.aspx?facility=N">http://verification.rld.state.nm.us/Search.aspx?facility=N</a>	
33	NEW YORK	NONE							
34	NORTH CAROLINA	License	\$38.00	\$225.00	1-year	\$150.00	None	<a href="https://ncitlb.org/current-licensees/">https://ncitlb.org/current-licensees/</a>	Established 12/01/2023
35	NORTH DAKOTA	Proof of Certification							No fees attached to proof of certification requirement.
36	OHIO	NONE							
37	OKLAHOMA	NONE						<a href="https://www.oklahoma.gov">https://www.oklahoma.gov</a>	State screening tests provided. Unclear regarding if the state accepts proof of RID, BEI, NAD Certifications
38	OREGON	License	\$150.00	\$250.00	1-year	\$350.00	\$50.00	oregon.gov Then search for "ASL Interpreter License"	Additional \$50.00 for Legal license. **These may not be final numbers.
39	PENNSYLVANIA	Registry Only	No	\$100.00	2-years	\$100.00	None	<a href="https://www.legis.stste.pa.us">https://www.legis.stste.pa.us</a>	
40	RHODE ISLAND	License	No	\$50.00	1-year	\$50.00	None	<a href="https://www.health.RI.gov">https://www.health.RI.gov</a>	

	A	B	C	D	E	F	H	K	L
41	SOUTH CAROLINA	Certification Required	No	None	None	None	None	<a href="https://www.scstatehouse.gov">https://www.scstatehouse.gov</a>	
42	SOUTH DAKOTA	NONE							
43	TENNESSEE	NONE							
44	TEXAS	NONE	No				None	<a href="https://www.hhs.texas.gov">https://www.hhs.texas.gov</a>	
45	UTAH	Certification Recognition	No	\$70.00	1-year	\$50.00	None	<a href="https://jobs.utah.gov/usor/uip/">https://jobs.utah.gov/usor/uip/</a>	
46	VERMONT	NONE							
47	VIRGINIA	NONE							
48	WASHINGTON	NONE							
49	WEST VIRGINIA	Registration	No	\$25.00	3-years	None if renew before expiration date	None	<a href="https://www.dhhr.wv.gov">https://www.dhhr.wv.gov</a>	Late renewal requires \$25.00 fee
50	WISCONSIN	License	No	\$75.00	2-years	\$60.00	None	<a href="https://www.dhs.wisconsin.gov">https://www.dhs.wisconsin.gov</a>	Initial year fee is reduced to \$60.00 after June 30
51	WYOMING	NONE							
52	DISTRICT OF COLUMBIA (DC)	NONE							



STATE	CREDENTIAL REQUIRED	INITIAL FEE (Including Application Fee, if any)	DURATION	RENEWAL FEE	SPECIALITY FEE: Each MEDICAL & Legal
OREGON	License	\$400.00	1-year	\$350.00	\$50.00
NORTH CAROLINA	License	\$263.00	1-year	\$150.00	None
ALABAMA	License	\$225.00	1-Year	\$175.00	None
ILLINOIS	License	\$225.00	1-year	\$150.00	None
MAINE	License	\$200.00	1-year	\$200.00	NONE
NEW HAMPSHIRE	License	\$200.00	3-years	\$175.00	None
NEBRASKA	License	\$150.00	2-years	\$150.00	None
KENTUCKY	License	\$175.00	1-year	\$125.00	None
ARIZONA	License	\$125.00	1-year	\$50.00	None
IOWA	License	\$120.00	1-year	unknown	None
PENNSYLVANIA	Registry Only	\$100.00	2-years	\$100.00	None
IDAHO	License	\$95.00	1-year	None	None
WISCONSIN	License	\$75.00	2-years	\$60.00	None
UTAH	Certification Recognition	\$70.00	1-year	\$50.00	None
NEW MEXICO	License	\$65.00	2-years	\$50.00	None
MISSOURI	License	\$60.00	1-year	\$60.00	None

[illegible]

Additional Information	Example for Oregon adding Legal as well as medical.
There are other additional license fees for Legal (\$50.00) and Educational (too complex to iterate here) licenses. I have only included Medical Specialty fees on this spreadsheet. I have not compiled Legal licensing fees for states other than Oregon.	If an interpreter got a license that includes both Medical and Legal cost would be: \$450.00 first year and \$400.00 each renewal year.

Of the 50 states plus DC only 23 have fees. 28 States have NO FEES.

**Oregon is THE ONLY STATE to require additional fees for Medical interpreters.**

**fewer than 50% of states have licensing fees.**

**Of the 23 states that have license fees only 5 are \$200.00 dollars or more.**

Oregon's licensing cost (for Supervisory PLUS Medical only) is \$137.00 more than the next closest state.

**Oregon's cost is \$375.00 more than the state with the lowest fees.**

**\$117.00 is the median fee for first year license fee.**

It is imperative Oregon reevaluate their fee structure to ensure that interpreters can afford to obtain licensure in Oregon. Licensure is not a stand alone requirement. To obtain a license to interpret in Oregon one must be Certified, One must be Supervisory PLUS Medical, and One must have 80 hours of medical interpreting. These costs add up to an exorbitant amount on an interpreter's pay. Interpreter take home pay is much less than in other states.

#### **Additional Requirements for Licensure as a Medical Interpreter:**

Oregon requires interpreters to obtain additional qualifications to work as a Medical interpreter:

1. Hold Interpreter Certification from RID or other approved body, for example the NIC test administered by CASLI

**\$280.00 Written test CASLI**

**\$395.00 Performance Exam CASLI**

2. Submit to a Language Proficiency Interview (now ONLY provided by Bridges Oregon. There appears to be a conflict of interest as Bridges Oregon is the only provider of the interview. **COST of this evaluation is \$185.00 (no diagnostic feedback) OR \$220.00 (with diagnostic feedback)**

2. Interpreters must have 80-hours of medical interpreting AND take and pass a 60-hour course in medical interpreting

**Cost of 60-hour training: \$585.00**

#### **COSTS To be Licensed:**

1. \$675.00 Total cost for NIC exam by CASLI

2. \$185.00 Language proficiency Interview

3. \$585.00 60-hour training

4. \$400.00 To obtain the Supervisor License (3+ years of Interpreting Experience) PLUS Medical license

**\$1,845.00 TOTAL minimum to START as a medical interpreter in Oregon**

must have passed a Language Proficiency Interview, and one must have passed a 60-hour training in medical people assume. I saw one good breakdown that divides a freelance interpreter's income into thirds (1/3 taxes

flict of interest with Bridges Oregon because they are both on the committee determining licensing requireme

5, 1/3 expenses, 1/3 take home income. If an interpreter earns \$90K per year they are only bringing home \$30K. The state is not paying for the interpreter's expenses and fees AND proctoring the evaluation that will determine an interpreter's ability to obtain a license in O

JK which is not a lot to live on.

**From:** [Dorothy Maron](#)  
**To:** [Patnode Samie](#)  
**Subject:** Proposed Rules  
**Date:** Thursday, April 4, 2024 10:31:03 AM  
**Attachments:** [Outlook-24lmstzs.png](#)

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You don't often get email from dorothym@coos-bay.k12.or.us. [Learn why this is important](#)

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Please share these comments at the upcoming hearing about the proposed rules for sign language interpreters:

First of all, it seems very strange and unfair that the cost of an educational interpreter is MORE than a medical or legal. Those both require more knowledge and have better pay. Why is that?

Also, I have a question about the license. I see that they added a Specialty License, "that will allow students and individuals in rural communities to continue training while they work towards fulfilling licensing requirements." It states that a person with a SLI may provide SLI services "under the direct on-site supervision of a person holding a SLI supervisory license or a SLI generalist license." Can you please clarify who can be a supervisor, and what constant supervision would look like?

I am curious about a person working towards certification that is testing soon. If they don't get results before the next school year, would they be required to get the Specialty License? Or could they continue to work as an Educational Assistant, and then if they pass, apply for a license to be able to interpret? They take so long to give results.

They initially discussed possible "exceptions." It looks like the specialty license is for those exceptions.. So some clarification would be much appreciated.

Sincerely,  
Dorothy

***Dorothy Maron***

**Educational Assistant**

Email: [dorothym@coos-bay.k12.or.us](mailto:dorothym@coos-bay.k12.or.us)





Phone: 541.888.1218  
400 Madison St.  
Coos Bay, OR 97420

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[Coos Bay Public Schools • 541-267-3104](#)

**From:** [Heather White](#)  
**To:** [Patnode Samie](#)  
**Subject:** SLI rules  
**Date:** Sunday, April 28, 2024 10:26:01 AM

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Hello,

I am writing about the SLI rules for the state of Oregon.

Overall I agree with what is being proposed but I still am not clear about what supervision looks like or what is required of me as a supervisor.

Where will people select a supervisor? How is this communicated between supervisor and provisional license holder?

Also, I am extremely concerned about the fees required. As a person who only works a few hours a year as a highly qualified interpreter this would not make it cost effective to work in the State of Oregon.

To hold these licenses SLIs have to already pay for testing, membership, and liability insurance. These fees are as much as or more than those fees.

Many states are already struggling to provide qualified interpreters in most settings. I believe this would put a bigger strain on the state trying to provide Sign Language interpretation and to recruit and retain them.

The board states the income of most interpreters. Those are prices before taxes.

As a medical interpreting provider there are fees on top of this for OHA. I don't think this is a system that can sustain itself.

Thank you.

Heather White CI/CT since 2003

**From:** [Jennifer Miller](#)  
**To:** [Patnode Samie](#)  
**Subject:** Public Comment  
**Date:** Tuesday, April 9, 2024 6:56:20 PM

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As a certified medical sign language Interpreter in the state of Oregon i agree with the following changes to the rule, specifically the portion which states  
(4) Submit proof of holding one of the following credentials: ¶ (a) Certification in ASL interpreting from the RID; or ¶ (b) American Sign Language Proficiency Interview or the Sign Language Proficiency Interview with a minimum proficiency level of 4 or advanced.

And not requiring both credentials to be held as there is already an additional medical certification through OHA that is required.

ADOPT: 816-025-0070 RULE SUMMARY: Application requirements for an SLI medical license. CHANGES TO RULE: 816-025-0070 Application Requirements for SLI Medical License ¶ ¶ An individual applying for a SLI medical license must:¶ (1) Meet the requirements of OAR 331 division 30.¶ (2) Submit a completed application form prescribed by HLO, which must contain the information listed in OAR 331-030-0000 and be accompanied by payment of all required fees.¶ (3) Hold an active SLI supervisory license under ORS 676.753 and OAR 816-025-0000 or an active SLI generalist license under ORS 676.756 and OAR 816-025-0020, both with no current disciplinary action.¶ (4) Submit proof of holding one of the following credentials: ¶ (a) Certification in ASL interpreting from the RID; or ¶ (b) American Sign Language Proficiency Interview or the Sign Language Proficiency Interview with a minimum proficiency level of 4 or advanced. Statutory/Other Authority: ORS 676.765, ORS 676.783 Statutes/Other Implemented: ORS 676.750, ORS 676.753, ORS 676.756, ORS 676.765, ORS 676.783, ORS 676.786 Page 15 of 24

Thank you,  
Jennifer Miller  
NIC, OHA Certified interpreter



2804 SW 6<sup>th</sup> St, Redmond OR 97756

To the Sign Language Interpreter Board,

We, as a team of rural interpreters serving Central Oregon, are greatly concerned with the proposed rules from the Board. One of the greatest areas of concern is the requirement for a *Secondary* level passing the EIPA. At least half of our team passed their EIPA at the Elementary level, making them unqualified for community work starting in June. This greatly limits the pool of interpreters available in community settings, meaning that our Deaf college students, Deaf employees, and members of the community wanting to participate in theater or public talks of any kind will be facing a severe lack of interpreters and may be unable to participate with appropriate access.

We are also greatly concerned with the limitation on the five-year limited renewal for educational interpreters, as some of us only interpret in K-12 settings. While we understand that this is a legislative concern and cannot be changed by the Board, we do want to express this concern for how the law was written, as many interpreters who work exclusively in K-12 settings will not be able to afford a generalist and then supervisory license.

Our next concern is the unclear definition of supervision for provisional license holders—in our community, there are not enough Generalist/Supervisory license holders to be able to directly supervise Provisional license holders, leading to an ever-increasing demand in our area. If indirect supervision is allowed, clear definitions of supervision should be supplied.

Sincerely,

The Sign Language Interpreter Team  
High Desert Educational Service District  
2804 SW 6<sup>th</sup> St, Redmond OR 97756  
541-693-5600

**From:** [Kara DeGiovanni](#)  
**To:** [Patnode Samie](#)  
**Subject:** Comment submittal: Sign Language Interpreter Licensing Rules  
**Date:** Sunday, April 28, 2024 11:59:07 AM

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To Whom it Concerns,

My name is Kara DeGiovanni and I have been a working ASL interpreter in the state of Oregon for five and a half years. I've also been a Spanish interpreter for 11 years. Please see my comments below regarding rule-making for sign language interpreter licensure, specifically regarding the Specialty Training License. The document I used to base these comments is found here: [https://www.oregon.gov/oha/PH/HLO/Proposed%20Rules/SLI-Proposed\\_Rules-06-08-24.pdf](https://www.oregon.gov/oha/PH/HLO/Proposed%20Rules/SLI-Proposed_Rules-06-08-24.pdf)

My concern is that the current requirements for the entry level license (Specialty Training) make it virtually impossible for those to whom the license applies (recent graduates from Interpreter Training Programs and early career interpreters with less than five years experience) to stay in the profession, causing an even greater shortage of interpreters.

1) The interpreting field is almost entirely freelance. Third party language companies control how virtually all freelance interpreters access work, and we interpreters have no control over who language companies pair us with. Companies are not mandated to ensure Specialty Training interpreters get paired with Supervisory interpreters only. The companies would very likely prioritize interpreters with a Provisional license or above, leaving Specialty Training interpreters with little access to work. When language companies can't find someone with a Provisional license or above, a Specialty Training interpreter could be assigned to work and most likely be out of compliance if their team interpreter doesn't happen to hold a Supervisory interpreter.

2) A recent grad or early career interpreter couldn't possibly survive financially if they have to have direct supervision on every assignment. It takes an average of 3-5 years for an early career interpreter to pass *any* of the exams required for the Provisional license. These interpreters would not be able to stay in the field long enough to get a Provisional license because 1) they would not be getting enough work to develop the skills necessary to pass the exams, and 2) they wouldn't be able to earn enough in the meantime. This would cause a shortage of interpreters

3) Most freelance work is medical. Because Specialty License interpreters are forbidden from working medical assignments, even with a Supervisory interpreter, their access to work is even less. Again, making it impossible for them to get enough work to develop their skills and earn enough money to stay in the career.

**Possible solutions:**

Require Specialty Training interpreters to show proof of a certain number of hours

under direct supervision of a Supervisory interpreter. Perhaps 15 hours every three months. This could come in the form of a form signed by the Supervisory interpreter with whom the Specialty Training interpreter worked.

Require Specialty Training interpreters to provide written proof of in-person (or Zoom) mentoring sessions with an ongoing Supervisory interpreter OR a variety of Supervisory interpreters. This could come in the form of dates of meetings, topics covered, and signature from Supervisory interpreter(s). Perhaps three hours per month.

Thank you for your time and consideration of my comments.

Sincerely,

Kara DeGiovanni, M.S.  
ASL/Spanish/English Interpreter  
971-275-0905  
she/her/hers

**From:** [Kara DeGiovanni](#)  
**To:** [Patnode Samie](#)  
**Subject:** Second Comment submittal: Sign Language Interpreter Licensing Rules  
**Date:** Sunday, April 28, 2024 12:14:36 PM

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Hello again,

I neglected to copy/paste my final comment in the email I submitted a couple minutes ago. Please see this addition comment here, and my previous email below that.

All interpreters across the nation, regardless of certification, license or professional status are expected to follow the RID Code of Professional Conduct. We are trained extensively in Ethics and this CPC throughout our Interpreter Training Programs. This includes the tenet :

**PROFESSIONALISM:** Interpreters possess the professional skills and knowledge required for the specific interpreting situation.

This means recent grads and early career interpreters must be aware of their skills and limitations and only accept work that they are capable of. This aligns with the purpose of the Specialty Training license, which is to minimize any negative impact of an early career interpreter's developing skills on the Deaf consumers. Thus, interpreters with the entry level license do not necessarily require direct supervision of every assignment they work. This will allow them to get enough work to survive, stay in the field, and gain longevity and developed skills. Some direct on-site supervision and mentoring are worthwhile for early career interpreters, and do I advocate for some of that on a more feasible level, as described in my first comment submission seen below.

Thank you again,

Kara DeGiovanni, M.S.  
ASL/Spanish/English Interpreter  
OR State Certified - Spanish  
971-275-0905  
she/her/hers

On Sun, Apr 28, 2024 at 11:58 AM Kara DeGiovanni <[kcdegi@gmail.com](mailto:kcdegi@gmail.com)> wrote:

To Whom it Concerns,

My name is Kara DeGiovanni and I have been a working ASL interpreter in the state of Oregon for five and a half years. I've also been a Spanish interpreter for 11 years. Please see my comments below regarding rule-making for sign language interpreter licensure, specifically regarding the Specialty Training License. The document I used to base these

comments is found here: [https://www.oregon.gov/oha/PH/HLO/Proposed%20Rules/SLI-Proposed\\_Rules-06-08-24.pdf](https://www.oregon.gov/oha/PH/HLO/Proposed%20Rules/SLI-Proposed_Rules-06-08-24.pdf)

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**Possible solutions:**

Require Specialty Training interpreters to show proof of a certain number of hours under direct supervision of a Supervisory interpreter. Perhaps 15 hours every three months. This could come in the form of a form signed by the Supervisory interpreter with whom the Specialty Training interpreter worked.

Require Specialty Training interpreters to provide written proof of in-person (or Zoom) mentoring sessions with an ongoing Supervisory interpreter OR a variety of Supervisory interpreters. This could come in the form of dates of meetings, topics covered, and signature from Supervisory interpreter(s). Perhaps three hours per month.

Thank you for your time and consideration of my comments.

Sincerely,

Kara DeGiovanni, M.S.  
ASL/Spanish/English Interpreter  
971-275-0905  
she/her/hers





**From:** [Wendel Laura A](#)  
**To:** [Patnode Samie](#)  
**Cc:** [Chad A Ludwig](#); [president](#); [Nyamu Edna](#)  
**Subject:** CASLI/RID - ASLPI/SLPI evaluations, response from Bridges  
**Date:** Monday, April 8, 2024 9:18:44 AM

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Dear Samie:

OCHCI has been receiving public comment about the requirement OHA HCI program has regarding the rule for Sign Language HCIs to have both RID and one of the two proficiency tests: ASLPI or SLPI/ASL. That rule was effective as of Aug 1, 2023.

Bridges provided a description of how the evaluations differ. See below.

Thank you,  
Laura

**Laura Wendel, MPH**

Healthcare Interpreter Program Coordinator  
Equity and Inclusion Division  
OREGON HEALTH AUTHORITY  
[laura.a.wendel@oha.oregon.gov](mailto:laura.a.wendel@oha.oregon.gov).  
503-381-7827

---

**From:** Chad A Ludwig <Chad@bridgesoregon.org>  
**Sent:** Saturday, April 6, 2024 3:14 PM  
**To:** Wendel Laura A <LAURA.A.WENDEL@oha.oregon.gov>  
**Cc:** president <president@oad1921.org>; Nyamu Edna <Edna.Nyamu@oha.oregon.gov>  
**Subject:** Re: connection and public comments

Hello!

I had one of my team members from NSLA service to put together a written response. Here you go.

Professional interpreters undergo assessments such as CASLI and RID to gauge their language proficiency and interpreting skills, which is crucial. However, a significant aspect often overlooked is the ability to effectively engage with Deaf customers/clients in discourse and interaction. This is where the Sign Language Proficiency Interview (SLPI) and American Sign Language Proficiency Interview (ASLPI) come into play, offering authentic evaluations through real conversations in American Sign Language.

Upon entering a job, every interpreter must engage in conversations with Deaf customers/clients to establish understanding and language use. Unfortunately, many fall short in these casual interactions. While CASLI and RID assessments provide valuable insights, they primarily focus on one-way communication and can be scripted or memorized, allowing some interpreters to exploit the system.

Unlike these assessments, ASLPI & SLPI evaluates both expressive and receptive skills through live, two-way conversations. This dynamic approach ensures authenticity and prevents cheating or memorization. Interpreters proficient in both expressive and receptive aspects of ASL shouldn't struggle with ASLPI & SLPI. However, those with weaknesses in either area can benefit from identifying strengths and areas needing improvement through ASLPI & SLPI's detailed feedback, unlike CASLI and RID.

ASLPI & SLPI's 11 scoring levels accurately reflect ASL proficiency, with intermediate being a benchmark level. Professionals in various fields, such as teacher assistants or police officers, can earn incentives based on their ASL proficiency level, with intermediate plus being a common requirement. In medical settings, where precision is critical, interpreters must ideally achieve advanced proficiency to ensure effective communication and prevent potentially fatal errors, as witnessed in unfortunate incidents caused by unqualified interpreters.

Just as professionals in other fields undergo rigorous assessments, interpreters must also prioritize quality over quantity. Any reluctance towards ASLPI & SLPI may indicate potential shortcomings. Therefore, embracing ASLPI & SLPI not only ensures competence but also upholds the integrity of interpreting services, ultimately benefiting Deaf customers/clients and the community as a whole.

Many thanks  
-Chad

On Thu, Mar 21, 2024 at 4:12 PM Wendel Laura A <[LAURA.A.WENDEL@oha.oregon.gov](mailto:LAURA.A.WENDEL@oha.oregon.gov)> wrote:

Hi Chad and Jack:

Nice to see you again and meet you (Jack). I remember Jack attended the public hearing on the update of HCI rules. Edna and I try to listen to the SL board meetings, but often cannot attend the entire meeting.

We have been receiving public comments about the addition of SLPI:ASL or ASLPI to the requirements since the rule was updated as of Aug 1, 2023. This week we have received probably 10 public comments (and growing) pushing back on this and expressing objection to the rule. We are keeping the Council informed and considering next steps. I have attached a sample copy of the comment we are receiving. We are eager to learn what the SL Board decides for its rules as I know there has been some attempt to align them with HCI.

As Edna said, we are glad to have contact with you. FYI, we are still seeking a Deaf community member to join the Council and/or an ASL SME. Please let the your communities know about this opportunity.

Thank you,  
Laura

**Laura Wendel, MPH**

Healthcare Interpreter Program Coordinator  
Equity and Inclusion Division  
OREGON HEALTH AUTHORITY  
[laura.a.wendel@oha.oregon.gov](mailto:laura.a.wendel@oha.oregon.gov).

503-381-7827

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**From:** Nyamu Edna <[Edna.Nyamu@oha.oregon.gov](mailto:Edna.Nyamu@oha.oregon.gov)>

**Sent:** Thursday, March 21, 2024 3:43 PM

**To:** 'Chad A Ludwig' <[Chad@bridgesoregon.org](mailto:Chad@bridgesoregon.org)>; president <[president@oad1921.org](mailto:president@oad1921.org)>

**Cc:** Wendel Laura A <[LAURA.A.WENDEL@oha.oregon.gov](mailto:LAURA.A.WENDEL@oha.oregon.gov)>

**Subject:** RE: connection

Hi Chad,

It's good to hear from you! [@president](#), Jack, it's a pleasure to e-meet you. I look forward to connect with you more around this important work. [@Chad A Ludwig](#), It's interesting because Laura (cc'd in this email) and I we were just talking about reaching out to you.

Laura will contact you sometime soon regarding HCI ASL rules and requirements.

Let's stay in touch. Jack, please don't hesitate to reach out if you have any questions.

Take care!

Thank you,

**Edna Nyamu**

Master of Science in Global Health (MSGH)

Health Care Interpreter Program Manager

**Oregon Health Authority (OHA)**

Equity and Inclusion Division

[Edna.Nyamu@OHA.Oregon.gov](mailto:Edna.Nyamu@OHA.Oregon.gov)

421 SW Oak St. Suite 750 Portland, OR 97204

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\*\*\*Working from home and visiting the office as needed\*\*\*

<https://www.oregon.gov/oha/EI/Pages/index.aspx>



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**From:** Chad A Ludwig <[Chad@bridgesoregon.org](mailto:Chad@bridgesoregon.org)>

**Sent:** Thursday, March 21, 2024 12:20 PM

**To:** Nyamu Edna <[Edna.Nyamu@oha.oregon.gov](mailto:Edna.Nyamu@oha.oregon.gov)>

**Cc:** president <[president@oad1921.org](mailto:president@oad1921.org)>

**Subject:** connection

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Edna

Hi! I would like to connect you with Jack Ludwig and full disclosure, he is my husband.

Jack is the current president of Oregon Association of the Deaf (OAD) and he is chair for the Sign Language Interpreter (SLI) board with the Health Licensing Office under Oregon Health Authority.

Many thanks!

-Chad

--

*My native language is American Sign Language. While I am bilingual, you may notice English translation errors. Contact me if you have any questions or need clarification.*

-----  
Chad A. Ludwig, MSW, ADAC, OHCI, CDI

*While ASL pronouns are gender-neutral, in English, please refer to he/him/his*

**Executive Director**

**Bridges Oregon, Inc.**

Physical address

475 Cottage St NE, Suite 120

Salem, OR 97301

Mailing address

1115 Madison St NE #1069

Salem, OR 97301

(971) 202-1500 main  
(503) 385-1185 fax  
[chad@bridgesoregon.org](mailto:chad@bridgesoregon.org)

[BridgesOregon.org](http://BridgesOregon.org)  
[Facebook](#), [Instagram](#), [LinkedIN](#), and [YouTube](#)  
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*My native language is American Sign Language. While I am bilingual, you may notice English translation errors.  
Contact me if you have any questions or need clarification.*

-----

Chad A. Ludwig, MSW, ADAC, OHCI, CDI  
*While ASL pronouns are gender-neutral, in English, please refer to he/him/his*  
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[Facebook](#), [Instagram](#), [LinkedIN](#), and [YouTube](#)  
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**From:** [Leah Stadler](#)  
**To:** [Patnode Samie](#)  
**Subject:** Interpreter licensing feedback  
**Date:** Thursday, April 4, 2024 2:30:26 PM

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Hello,

Below includes my experience working with interpreters as a Teacher of the Deaf:

- The notification came as a surprise to many of the interpreters I work with or have worked with. Along with the deadline and turnaround time to adjust, specifically in the classrooms to this new expectation in a limited amount of time.
- I have had interpreters express their frustration of the amount/cost of the license to the amount that they are paid as an interpreter, specifically in more rural areas of Oregon in K-12.
- There were a lot of information gaps in the way this information was presented and "what if's" for a variety of settings within K-12 and things might look or not look, but then not knowing how things were going to play out.

Thank you for your time !

Leah Stadler  
BA-ASL Studies, MS-SPED&D/Hh Education  
Teacher of the Deaf/Hh  
Lane ESD  
541-952-1716

Oregon Health Authority  
Health Licensing Office  
C/O Samie Patnode  
1430 Tandem Ave. NE, Suite 180  
Salem, OR 97301

April 26, 2024

Dear Health Licensing Office,

Thank you for your consideration of public comment regarding the proposed rules for Sign Language Interpreting licensure. My name is Cheyanne and I am a sign language interpreter in rural Southern Oregon. I graduated from Western Oregon University with a Bachelor of Science in American Sign Language/English Interpreting in June 2022. I have held a temporary Generalist Sign Language Interpreter license since December 2023. I speak from the perspective of working in rural Southern Oregon, primarily in K-12 educational settings.

This letter has been written in collaboration with several of my interpreting colleagues in Southern Oregon. Being newer to the field, I am grateful to work with a group of professionals from varied backgrounds. We have become interpreters through degree programs, on-the-job training, D/deaf family and friends, and more. Some of my colleagues have been interpreting for over 30 years, providing insight into our profession's evolution. Even without licensure in the picture, we face numerous challenges as interpreters in a rural area. We believe that our concerns should be equally considered alongside our colleagues in urban communities.

While being interpreters is our privilege, equitable communication access for the D/deaf community we serve is their right. As the proposed rules are written, several barriers exist to ensure a sufficient supply of quality interpreters is available to meet their needs. Revising some of the proposed rules can reduce the likelihood of the community we serve going without the access they are entitled to.

---

**Collectively, we have determined our greatest concerns to be as follows.**

**1.) Accepted credentials for Generalist and Supervisory licenses, and consumer impact**

As the proposed rules are written, a Generalist or Supervisory license may be secured through an EIPA Performance exam score of 4.0 or above at the secondary level. We suggest this be changed to include all EIPA Performance Exam scores of 4.0 or above, both at the elementary and secondary levels. Both exams are rated using the same five categories, which suggests that interpreters have an equivalent skill level not dependent on the exam they took. We also suggest



that if Registry of Interpreters for the Deaf (RID) credentials not currently offered are accepted for a Generalist or Supervisory license (ex. CI/CT), the Ed:K-12 credential should be included. While the Ed:K-12 credential has not been awarded since 2016, it is still a fully recognized credential by RID. If RID recognizes a credential, certainly Oregon state licensure should.

There is a desperate need for experienced interpreters to provide community interpreting services in rural Southern Oregon. In more populated areas, there may be a sufficient number of interpreters to specialize in different settings. In Southern Oregon, many of us are generalists in the sense that we work in a wide range of settings. Many of my colleagues and I interpret with K-12 students during the school day, and then with adults outside of school hours.

Several of my highly skilled colleagues are not currently eligible for a Generalist or Supervisory license because their 4.0 or above EIPA scores come from the elementary level exam. They have provided quality interpreting services to all ages for numerous years. They are the interpreters available in the community after school hours, on the weekends, and during school breaks. If they are limited in their licensing options, it is not a question of if, but when D/deaf individuals will be left without sufficient communication access.

Additionally, these skilled interpreters are needed to provide mentoring and supervision to new interpreters. We are a small field. There are already not enough interpreters to fulfill every need, especially in Southern Oregon. If we want to raise quality new interpreters to meet those needs, we need quality mentors and supervisors. The hard truth is that come June 8th, we will not have that unless the proposed rules are amended. That means our small pool of professionals will shrink, leading us further away from the goal of ensuring sufficient communication access.

## **2.) Effecting the specialty training license for interpreters who are new and/or not yet credentialed, and what supervision looks like for these licensees**

As the proposed rules are written, on-site supervision for interpreters with a specialty training license must be provided by an interpreter with a Generalist (until July 1, 2030) or a Supervisory license. While this sounds positive on paper, it is not comprehensive enough to support our needs in Southern Oregon. Most of the interpreters in our area work primarily in K-12 educational settings. Of them, many already serve as wonderful mentors to novice interpreters and would be well-suited to serve as supervisors for specialty training licensees.

These are interpreters with years of experience, a wealth of knowledge, and satisfactory Educational licenses. However, not all of them are eligible for a Generalist or Supervisory license. We would prefer to see these interpreters supervising in educational settings over a Generalist or Supervisory licensed interpreter with no educational interpreting experience.

This is why we propose that, instead of saying a licensed Generalist or Supervisory interpreter must supervise a specialty training licensee, we say that an experienced interpreter must be their

supervisor. In this case, experienced could mean three or more years of interpreting experience. Three years of experience is suggested because it aligns with the current requirements for a Supervisory license. In Southern Oregon, we do not have enough interpreters eligible for Supervisory licenses to support all of the interpreters who need supervision. However, we do have numerous experienced interpreters with three or more years under their belt who could be that support to a novice interpreter.

If this were enacted, the interpreters already serving as mentors in our community would be able to continue in their roles, and provide additional support to specialty training licensees. While this would likely benefit all realms of interpreting, we believe that it is essential for K-12 educational settings. Interpreting with children and within the educational system is a specialized skill. To best serve our students, we must have skilled supervisors for their interpreters.

### **3.) Educational interpreting license renewal timeline**

As the proposed rules are written, an Educational license can be renewed up to five times before a Generalist license will be required. This contradicts the requirements upheld by the Oregon Department of Education since 2008. Per the ODE, once an interpreter has fulfilled their initial requirements, they are legally permitted to interpret in educational settings as long as they keep up with yearly continuing education. We do not understand the purpose of changing this now.

Some of the interpreters I work with in Southern Oregon specialize in K-12 educational settings. It does not make sense to require them to eventually get a Generalist, and then Supervisory, license when they have no intention of ever working outside of education. Forcing a Generalist or Supervisory license on an interpreter who only works in education removes their autonomy and disrespects their desires.

Eventually requiring a Generalist or Supervisory license to work solely in K-12 educational settings means these interpreters will have to take and pass additional credentialing exams. As stated previously, the ODE has never required this. This is why we suggest that an Educational license have unlimited renewals, respecting the interpreting professionals working in education.

### **4.) Revisions to the requirements for Supervisory and Generalist licenses**

As the proposed rules are written, eventually, every interpreter will be required to have a Supervisory license. This is because of the renewal timelines for the licenses below it. Some interpreters have a desire to mentor, supervise, and lead in our field. I would love to do that myself after gaining more experience. Some interpreters do not have a desire for this, though, and that should be respected at the licensing level.

While having a Supervisory license does not mean an interpreter is required to supervise, the title suggests that. This is why we propose that the Supervisory and Generalist licenses be equal in all aspects, except for the following: The Supervisory license will require three years of interpreting

experience, and it will be designated for interpreters who want to become supervisors.

Right now, a Generalist license can only be renewed twice before an interpreter must apply for a Supervisory license. We propose that this be revised to unlimited renewals. What this means is that a skilled interpreter who meets the requirements for either a Generalist or Supervisory license can determine which is the best fit for them. If an interpreter would like to be a supervisor, they can apply for a Supervisory license. If they do not desire supervisory responsibilities, they can apply for a Generalist license. Both licenses would allow the same permission to work in all settings except medical and legal.

### **5.) Licensure fees and endorsements**

As the proposed rules are written, the cost of maintaining yearly licensure will be an undue burden on interpreters. We are asking the HLO to reconsider the fee schedule, as they now have the data for interpreting income, which is included in the proposed rules. We do not understand why the fees are so high in comparison to other states, and why renewal must occur every year. While the fees would still be high, they would be more manageable if license renewal took place every two or more years. Other states with interpreter licensure have significantly lower fees than Oregon, with an extended renewal timeline.

Additionally, we are wondering if future considerations could be made to adjust the license structure to include endorsements. We envision this to be an interpreter with either a Supervisory or Generalist license who can receive medical and/or legal endorsements, rather than having to obtain separate licenses to work in those settings. Other professions operate under this model and it seems as though it would be effective in our field as well.

---

Thank you again for considering our public comment regarding licensure for sign language interpreters. We believe that licensure will eventually ensure sufficient quality interpreting services, but that is unlikely to happen with the proposed rules as written. We look forward to hearing from you soon.

Sincerely,

**Cheyenne Bumgardner**

Licensed Generalist Sign Language Interpreter

Bachelor of Science in ASL/English Interpreting, Western Oregon University

2 years of interpreting experience

**In collaboration with:**

**Morgan Bell**

Licensed Educational Sign Language  
Interpreter  
Bachelor of Arts in Deaf Studies,  
Sacramento State University  
Child of Deaf Adults (CODA)  
7 years of interpreting experience

**David Brown**

Educational Sign Language Interpreter  
Bachelor of Arts in Elementary Education,  
Southern Oregon University  
Child of Deaf Adults (CODA)  
23 years of interpreting experience

**Lucas Charley**

Licensed Educational Sign Language  
Interpreter  
5 years of interpreting experience

**Shelly Clement**

Licensed Educational Sign Language  
Interpreter  
Parent of a Deaf Child  
30 years of interpreting experience

**Bonna Greene**

Licensed Educational Sign Language  
Interpreter  
32 years of interpreting experience

**Marti Hill**

Educational Sign Language Interpreter  
Parent of a Deaf Child  
9 years of interpreting experience

**Becky Oyerly**

Licensed Educational Sign Language  
Interpreter  
RID Ed:K-12 certification  
Child of Deaf Adults (CODA)  
32 years of interpreting experience

**Belle Tower**

Licensed Generalist Sign Language  
Interpreter  
Associate of Applied Science in  
ASL/English Interpreting, Portland  
Community College  
7 years of interpreting experience

**Niquita Wilkinson**

Licensed Educational Sign Language  
Interpreter  
RID Ed:K-12 certification  
Interpreter Training Program, Abram  
Friedman Occupational Center  
33 years of interpreting experience

**From:** [Mae Won](#)  
**To:** [Patnode Samie](#)  
**Subject:** Oregon Board of Sign Language Interpreters  
**Date:** Monday, April 29, 2024 8:23:04 AM

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You don't often get email from mwon@pps.net. [Learn why this is important](#)

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Hi Samie,

I was told to refer my Qs and concerns to you. First of all, it has been very difficult to find and pull up our proposed administrative rules. I'm still not sure if I have the right document. Then it was very hard to understand. I have no idea what the proposed licensure is.

So, going off of a summary that we received, some of my concerns/complaints/questions are:

-Why is there an annual licensure fee when we already have to take and pay for Continuing education/Professional development workshops to continue our certifications? In order to keep our certification "active/alive" we need to submit proof to our employer. As an Educational interpreter, we do not make enough money to pay for these added, redundant fees. I feel that the "temporary/ provisional licence" that we had to apply for and received, should have been the official license. Documentation along with identification was required at that time, so why are we having to resubmit and pay for "application fee" and license fee? Why can't our temporary license be reissued as our official license?

-Why are you proposing to eliminate the EIPA certification for Educational interpreters when that certification was designed specifically for educational interpreters and was approved by the State of Oregon?

I have been interpreting for over 41 years in the school districts. My EIPA score was 3.9. I am planning on retiring in a couple years, and it would be nice if I did not have to go through more testing and reevaluations to do what I love doing.

Educational interpreters are trained differently than freelance (Generalist) interpreters. We break down language, we are a cultural and language liaison between the hearing staff and the deaf. We teach our kids how to advocate for themselves, we interpret worksheets and excerpts, passages from books and interpret written questions. Our "boundaries" are a little bit more fluid than freelance interpreters because we are a part of an educational team.

Eliminating the EIPA in exchange for the "generalist" certification would lose a number of well qualified and skilled interpreters who have the student's best interest.

When I retire in a couple more years, will I still be able to freelance interpret for my church? I have been interpreting for them for over 30 years and they pay me. Will churches be exempt from hiring "licensed" interpreters?

Sincerely,

Mae Won

Oregon Health Authority  
Health Licensing Office  
C/O Samie Patnode  
1430 Tandem Ave. NE, Suite 180  
Salem, OR 97301

April 21, 2024

Dear Health Licensing Office,

Thank you for your consideration of public comment regarding the proposed rules for Sign Language Interpreting licensure. My name is Marti Hill, and my Deaf ASL teacher at Southern Oregon University urged me to apply with Southern Oregon Education Service District many years ago because of my passion for ASL and the Deaf community and my experience as the mother of a deaf child. I have been a substitute sign language facilitator for nine years now with SOESD in rural Rogue Valley. I have no degree and there is no ITP here, so I have sought out and participated in hundreds of hours of trainings, workshops, and mentoring over the last several years.

I regularly work with a Deaf adult and a young DeafBlind child. Please create pathways to licensure so that individuals like these are not left without access. If I may continue in my current roles while I take the EIPA performance (on April 29) and EIPA written (on May 17), the Deaf adult will continue to provide leadership for me (including in summer school—continuity is important for young children), and I will continue to add to the 35+ hours of specialized DeafBlind trainings and mentorship I have recently sought out on my own time to learn how to better meet the child's very unique needs. Both of the EIPA tests I am taking are not even in Oregon because there are none offered in Oregon through the end of June (at least). This does not make sense when Oregon is requiring licensure. Also, from what I understand, I won't get results back from the EIPA performance test for several months. (See attached.) It is unfair to leave our local, rural Deaf and DeafBlind without access during this very extended waiting period.

There are several barriers to testing in Southern Oregon. Besides there being no tests offered in Oregon after I was waitlisted (and never contacted) for the April 13 performance test, because I am considered a substitute despite having regular, ongoing assignments each week, I will be paying well over one thousand dollars from my family's budget to take these tests. In addition to the testing fees, there are travel expenses and hotel costs.

There is already a serious lack of interpreters in the Rogue Valley, so this transition to licensure needs to be made carefully and thoughtfully. I am the only interpreter at the sites I work at, so while I have sought out plenty of supervision and mentoring in my continuing skill development, it's not possible to have another interpreter in the room. I fully support the end goal of qualified access for our local Deaf community and look forward to being a qualified, licensed interpreter. Since qualified and licensed interpreters are not flocking to our area to replace people like me, and we need to "grow our own" interpreters, please allow us the opportunity to continue providing access while we continue to improve our skills.

Thank you,  
Marti Hill

# IMPORTANT EIPA ANNOUNCEMENTS



## EIPA PERFORMANCE TEST TURNAROUND TIMES

Dear EIPA Community,

We regret to inform you of a delay in the turnaround time for EIPA (Educational Interpreter Performance Assessment) tests. As of this notice, the turnaround time is approximately 7 months. We apologize for any inconvenience this may cause and want to express our sincere appreciation for your patience and understanding during this time.

As we approach our busiest testing season, spanning from May through July, we anticipate a further increase in demand for EIPA tests, potentially resulting in extended turnaround times beyond the current delay. We recognize the consequences of this extended turnaround time on interpreters, school systems, and Deaf/hard of hearing students. Thank you for your support as we work to address these challenges and improve our services.

We kindly ask licensing boards to take the extended turnaround time into consideration when reviewing interpreters waiting for test results. Your understanding and cooperation in this matter are greatly appreciated.

## NEW POLICY FOR RETAKING THE PERFORMANCE TEST

EIPA is instituting a new policy effective immediately. As of April 29, 2024, test candidates retaking the EIPA performance assessment must wait 1 calendar year (365 days) from the date of their most recent exam. This policy aims to manage demand, allow interpreters adequate time to make improvements in their skill set for a different score, and ensure fair access to testing opportunities for all candidates. When registering for a test, interpreters must make sure the new date is at least 365 days after the date of their most recent test. If a new registration is less than 365 days from a previous test date, the new registration will be cancelled. The cancellation policy and associated fees will apply.

We understand the importance of timely access to EIPA test results. Our team is committed to minimizing delays and optimizing our processes to provide the best possible service to interpreters, educational agencies, and Deaf and hard of hearing students.

EIPA recognizes that some interpreters may face job insecurity due to this new policy. Interpreters who are currently employed and working on a provisional license that will expire in the next 6 months may apply to take the test 6 months after the date of their last test. Please reach out to our team at [eipa@boystown.org](mailto:eipa@boystown.org) for further assistance if you meet this criterion.

Thank you for your ongoing understanding and cooperation as we navigate through this period of transition. Should you have any questions or concerns regarding this announcement, the new policy, or exception approval process, please don't hesitate to reach out to our team for assistance.



**From:** [Melanie DeLeon](#)  
**To:** [Patnode Samie](#)  
**Subject:** I forgot to add this to my PC! Smile  
**Date:** Tuesday, April 23, 2024 9:13:37 PM

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Samie,

In my public comment I forgot to add that if a DI is granted the DISLI license (based on a letter of recommendation from an agency and takes a training on ethics(?!)), that holding that credential of DISLI allows/ opens the door for them to then get a medical and legal specialty license

Mel DeLeon, MS

ASL Court Certified Interpreter

**From:** [Melanie DeLeon](#)  
**To:** [Patnode Samie](#)  
**Subject:** Public Comment for State Board of Sign Language Interpreters  
**Date:** Tuesday, April 23, 2024 4:53:10 PM  
**Attachments:** [image.png](#)

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State Board of Sign Language Interpreters  
c/o Samie Patnode  
Health Licensing Office  
1430 Tandem Ave. NE, Suite 180  
Salem, OR 97301-2192  
[samie.patnode@oha.oregon.gov](mailto:samie.patnode@oha.oregon.gov)

**Re: OAR 816-025-0070 - SLI Licensure**

Dear Board of SLI Licensure,

My name is Melanie DeLeon, I am a sign language interpreter with over 30 years of interpreting experience in a vast variety of settings, including medical, legal, educational, and internationally. I have worked in the role of a staff interpreter for the Oregon Judicial Department, serving the geographically diverse state of Oregon. Additionally, I have been a manager for several Video Relay Services. It is with these experiences, knowledge of our local Deaf, DeafBlind, and Hard of Hearing communities that I am compelled to argue for the following Rule adjustments.

I have 3 proposed matters I would urge HLO to adopt to avoid harm and neglect to the protected class of Deaf, DeafBlind and Hard-of-hearing Oregonians.

First matter:

HLO needs to allow Deaf interpreters, who are not yet certified from RID/CASLI, to continue working in all settings- medical, legal, educational and community. This is a new professional field for Deaf interpreters, yet one that has been in practice wherever Deaf people have gathered for centuries. Deaf people have a long

history of "interpreting" for each other as the hearing interpreter/educator was not fluent or clear in ASL. These practices have deep roots in educational settings at residential schools and mainstream community based classrooms.

Making it a profession- where it is recognized and one can make a living doing it, is new. So new that Oregon only has 4 RID certified Deaf interpreters. Two out of the four hold full time jobs and are not always available, and all who live in Salem OR or further south- FOR THE WHOLE STATE OF OREGON.

When asked, here is one local agency's numbers. I can only assume the numbers are higher based on other known agencies who schedule ASL.

*Here's my numbers from CODAs Plus for 2023*

*We employed 14 DI and 1 CDI (part of last year Susan wasn't certified)*

*We paid out a total of \$127,764.75 to DI we paid a total of \$129,334.75 for CDI and DI*

*That equals to about 2587 hours.*

*We desperately need an alternate pathway for DI*

I personally know of one Deaf Interpreter who is fluent in Mexican Sign Language. He was able to supplement his Social Security monthly income with interpreting in a medical setting- earning upwards of \$20,000 dollars. The fiscal impact of NOT having an avenue for him to work, places him and his family back on food stamps and barely surviving. This does not even address the invaluable rare language interpreting he was able to provide in a medical setting for the state of Oregon.

I propose that the OREGON HEALTH AUTHORITY HEALTH LICENSING OFFICE, STATE BOARD OF SIGN LANGUAGE adopt the following:

Deaf Sign Language Interpreter Specialty License

DSLII Specialty License:

(1) A DSLII specialty license holder:

(a) May provide SLI services under the direct on-site or indirect remote supervision of a person holding a SLI supervisory license, a SLI medical license, a SLI legal license or a SLI generalist license.

(b) May provide SLI services in an educational setting under the direct on-site supervision or indirect remote supervision of a person holding a SLI supervisory license, a SLI generalist license or SLI educational license.

(2) A DSLI specialty license is current for one year and becomes inactive on the last day of the month one year from the date of issuance.

(3) A DSLI specialty license may be renewed up to ten times or at the discretion of the board.

(4) A DSLI speciality license can apply for a Medical and Legal specialty license if they meet the education/ training requirement of those licenses.

(5) The issuance or the license holder's holding of a DSLI license does not supersede, replace, or negate the need for the license holder to comply with other laws requiring licensure or registration, or competent SLI services.

(6) A DI specialty license is for purposes of ensuring effective communication for Deaf, Hard of Hearing, Foreign born and DeafBlind Oregonians. Additionally it is to ensure cultural and linguistic competency while interpreting services are being provided, and is an authorization under ORS 676.562.

Statutory/Other Authority: ORS 676.783 Statutes/Other

Implemented: ORS 676.750, ORS 676.783

\*\*\*\*\*

Second matter:

Acceptable credentials for a generalist license holder, NADIII & RSC should both be acceptable credentials. The Registry of Interpreters for the Deaf recognizes these credentials, and Oregon should be in line with national standards. To deviate from our national certifying body is negligent and will cause harm to our workforce. If you go to the RID database, ask to see "certified" interpreters, NADIII and RSC holders appear in the search.

Additionally, holders of these certificates, who still practice, have years of lived work experience to draw from, and provide valuable

services to our state.  
from the RID website

## NAD Certifications



These certifications were developed and administered by NAD and are recognized by RID.

### **NAD (National Association of the Deaf) Certifications**

#### **NAD III (Generalist) – Average Performance**

Holders of this certification possess above average voice-to-sign skills and good sign-to-voice skills. Holders have demonstrated the minimum competence needed to meet generally accepted interpreter standard. Occasional words or phrases may be deleted but the expressed concept is accurate. The individual displays good grammar control of the second language and is generally accurate and consistent, but is not qualified for all situations.

#### **NAD IV (Advanced) – Above Average Performance**

#### **NAD V (Master) – Superior Performance**

image.png



While doing a search of the RID database, there are no RSC certified interpreters in the state of Oregon.

We do have 6 NADIII, 2 of which do not have other credentials that qualify them. To bar two interpreters who have well over 15 years of work experience each- who one is a CODA, seems needless and unjust. Furthermore, it will deprive people of interpreting services and one person of long term employment.



Third matter:

In regards to the EIPA credential, the term "secondary" needs to be removed from all credential requirements. The ODE will have to let go of a portion of its union protected workforce of interpreters if this is kept in the Rules, it does not show understanding of what or how the EIPA assessment is designed. As you can see below, RID did not single out "secondary" when awarding this credential- it is silent on the matter. HLO should follow RID.

This credential is fully recognized by RID, but the designation is no longer awarded by RID. This designation went into moratorium effective January 1, 2016.

The EIPA assessment is still available through Boys Town. More information on that can be found at <http://www.classroominterpreting.org/eipa/>.

Holders of this certification demonstrated the ability to interpret or transliterate classroom content and discourse between students who are deaf and hard of hearing and students, teachers and school staff who are hearing. Certificants demonstrated EIPA Level 4\* skills using spoken English and at least one of the following visual languages, constructs, or symbol systems at either an elementary or secondary level:

- American Sign Language (ASL)
- Manually Coded English (MCE)
- Contact Signing (aka: Pidgin Signed English (PSE) or English-like Signing)
- Cued American English (CAE) (aka: Cued Speech)

This credential was offered from 2007 to 2016.

Thank you for your consideration.

Respectfully,

Melanie DeLeon, M.S., CI/CT, SC:L, NIC, NAD IV

Nationally Certified ASL Interpreter

Oregon ASL Court Certified Interpreter

OHCI# HCI000105381

**From:** [Melanie DeLeon](#)  
**To:** [Patnode Samie](#)  
**Subject:** Fwd: Deaf Services Unlimited - April 24  
**Date:** Wednesday, April 24, 2024 3:08:16 PM

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The below email really captures DIs and CDIs value well, and this is from a nationwide referral agency.

Thanks!

Melanie DeLeon, M.S., CI/CT, SC:L, NIC, NAD IV  
Nationally Certified ASL Interpreter  
Oregon ASL Court Certified Interpreter  
OHCI# HCI000105381

----- Forwarded message -----

**From:** Deaf Services Unlimited <[talktous@deafservicesunlimited.com](mailto:talktous@deafservicesunlimited.com)>  
**Date:** Wed, Apr 24, 2024 at 2:44 PM  
**Subject:** Deaf Services Unlimited - April 24  
**To:** Melanie <[melterp@gmail.com](mailto:melterp@gmail.com)>

[View this email in your browser](#)





## Certified Deaf Interpreters

A **Certified Deaf Interpreter (CDI)** is a professional who works in collaboration with a hearing sign language interpreter to facilitate effective communication between Deaf individuals and hearing individuals. While sign language interpreters primarily rely on spoken language and sign language skills, CDIs have an additional level of expertise in working with Deaf individuals who may have language barriers, unique cultural backgrounds, or complex communication needs.

**CDIs play a crucial role in situations where the Deaf individual may have a more challenging time understanding or expressing themselves in a specific form of sign language, such as ASL.** CDIs provide valuable support

by enhancing the interpretation process, adapting signs or interpreting techniques, clarifying messages, or using visual aids to ensure accurate and meaningful communication.

**One example of when a CDI might be especially important is communicating with individuals from different parts of the world.** If you are unable to find an interpreter who is proficient in the specific sign language requested, such as French Sign Language for example, you can utilize a Certified Deaf Interpreter. CDIs provide valuable support when there is a lack of availability of interpreters who specialize in a particular sign language. In such cases, the CDI can facilitate communication by using their advanced sign language skills, cross-cultural knowledge, and ability to adapt signs and interpretation techniques. Although they may not be fluent in the specific sign language requested, their expertise in working with Deaf individuals and their understanding of interpretation principles is still valuable in bridging the communication gap.

**CDIs are often employed when the subject matter of the event or meeting involves complex or technical content.** This can include legal proceedings, medical consultations, scientific conferences, technical trainings, or any situation where specialized terminology or concepts are used. CDIs, being Deaf themselves, possess a deep understanding of Deaf culture and can effectively convey the nuances and intricacies of such content.

**CDIs are also called upon in high-stress or emotionally charged situations, such as courtrooms, counseling sessions, or emergency situations.** They are skilled in managing the emotional intensity of these environments, and their expertise helps ensure accurate interpretation.

CDIs work in tandem with hearing interpreters to ensure accurate communication between all parties involved. They provide cultural and linguistic expertise, as well as insight into the unique communication styles and needs of the Deaf community.

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## Celebrating our CDIs

Meet Carole Lazorisak, MA

RID: RSC, CDI

ASLTA: Master

*Interpreter Mentor: Master*

Carole is one of the most experienced CDIs, having started her career in 1978. She has been interpreting over 45 years since the field was recognized as a profession. And with that kind of commitment, it's no surprise to learn that Carole loves working with the language and culture, interpreting to facilitate communication access across various settings.

Carole is part of the DSU family, and plays an important role within the Deaf community. She offers the following as her favorite quotation for the DI/HI team:

**“It takes two to tango.”**

To optimize interpreting, it requires a team effort to navigate language, cultural perspectives, backgrounds and topical analysis for optimal interpretation. She strongly advocates for the advancement and development of DI/HI interpreting teams, fostering excellence and inclusion in every interaction.

## Meet Robyn Lehmann-Doane

She/Her/Hers

Robyn started interpreting professionally with a RID-CDI Certification in 2008. However, she has been an informal Deaf interpreter for most of her life continuing to interpret as a DI up to the year of 2008. She was called into interpreting situations as a young child in an indefinite number of surroundings in a variety of language environments with a vast list of situational topics. She enjoys connecting and working with team interpreters in a broad range of interpreting assignments to provide communication access to various Deaf/HOH/DB clientele.

As an experienced CDI, Robyn shared the following tips for any DI/HI team, understanding that each DI has their own interpretation style and unique needs since we are all different and cannot be lumped together into a one-size-fits-all mold.

**TRUST is important with each other to have a successful team for each assignment.**

- Preparation is done and shared together.
- Being able to work collaboratively to co-construct meaningful communication exchanges in a respectful and professional manner.
- DIs need to trust their HIs voicing and choice of words in the translation process (In VRI –DIs can check for their HI team’s feed and communication for accuracy by turning on captioning in the

video platform). A cue needs to be set up if the DI needs to communicate with their HI team about an error in their interpretation process.

### **Interpreting Needs Aspect**

It is important to discuss each other's needs as a team. This requires vulnerability, trust, and honesty since some of our weaknesses and strengths will be on display. Sharing our needs will ensure that both teams will be successful:

- Identify the types of support needed for both DI/HI.
- Decide and create specific cues for DI/HI teams to use with each other in case assistance is needed before going into an assignment.
- DIs decide which language the HI should use when interpreting for feeding: English, PSE, ASL, or Flexible, etc.

### **Discuss who is in control, the DI or HI?**

- Will more than one team be needed or is just the DI/HI Team enough?
- Will either the DI/HI require a hard stop or can they continue past the assignment end time if requested by the client? If a hard stop is needed, who oversees the backup plan?

### **Discuss how the DI/HI team will determine the pace speed depending on the nature of the situation:**

- Simultaneous Interpreting:
  - Discuss preferences on the speed of the pace and feed flow.
  - Not everyone has the "working memory" to handle the fast flow of spoken conversation and still be able to draw upon signing concepts quickly enough to keep up with a rapid talking pace.
- Consultative Interpreting:
  - The DI may want a continuous feed pace OR they may want their HI to break down the information into smaller parts and pause between each concept to prevent information overload.
- Going between both Simultaneous/Consultative Interpreting:
  - The DI/HI team can adapt and go between Simultaneous and Consultative Interpreting depending upon the interpretation process and the Deaf/HOH/DB and other parties involved.

**Establish Cues as a CHI/CDI Team:**

This is when the DI-HI team needs to discuss and make sure that the integrity of the message is not compromised from the result of their cue negotiations.

- Adjust the message by repairing the feed or interpretation.
- Cues need to be pre-determined for inner-team communication to occur quickly and concisely.
- Cues are often used for the following:
  - HI informs DI when a situation is about to start (like in high-profile interpreting situations).
  - HI needs to feed figurative language, jokes, poems, or any challenging dense information.
  - Lack of visual information from the party due to VRI interpreting and the inability to see what is happening in the environment, or the inability to see a speaker's nonverbal communication, etc.
  - Message clarification is needed if something is forgotten during information overload, or when parties' communication is overlapping other conversations, interruptions, etc.
  - When process time or pauses are needed.

**Review and discuss prep materials before going into an interpreting assignment:**

- Check materials for any language concepts that may create issues in message interpretation and the different challenges that may occur in translating idioms, metaphors, analogies, figurative language, jokes, poems, technical language, etc.
- Decide whether consecutive or simultaneous interpretation will be used or if both will be used interchangeably.
- Discuss ahead of time if the HI will plan to use fingerspelling that requires exact word spelling during interpretation to ensure that the DI is able to reduce the mental processing that may cause information overload.
- Discuss the prep material's main points and goals to ensure message equivalency.
- Some meanings may be based on phonics or auditory senses for teams to figure out the best incorporation into a visual message

equivalency meaning.

- Teams can discuss how to convey various message equivalency in the interpreting process.

**Decide who takes the lead in explaining the interpreting process and answering client questions when entering the assignment:**

- Allowing the DI to explain this process enables the Deaf/HOH/DB consumer to observe the leadership role of the DI and to gain the parties' respect towards the interpreting profession.
- There may be times when the DI will ask the HI to take the lead depending upon the situation.
- DI/HI teams agree together on any shared goals and interpreting responsibilities that need to be established.

**Discuss as a team about the pausing that often happens with the HI's feeding techniques to DI:**

- The HI may put their hands down, or their hands may be holding onto signs for a longer period which causes changes in the pacing feed.

**Eye Gaze (Often a DI's pet peeve):**

- DIs need their HI team to watch and monitor them to check for feed and communication clarification.
- Eye gaze becomes an issue when HIs look down without maintaining eye contact with their DI team while feeding the interpretation.

**Monitoring Head Nods:**

- Head nods are used by the DI to direct the feeding from the Deaf/HOH/DB consumer to their HI team. It is important to identify when the head nod and eye gaze from the DI is directed to the HI.

**Signs vs Fingerspelling:**

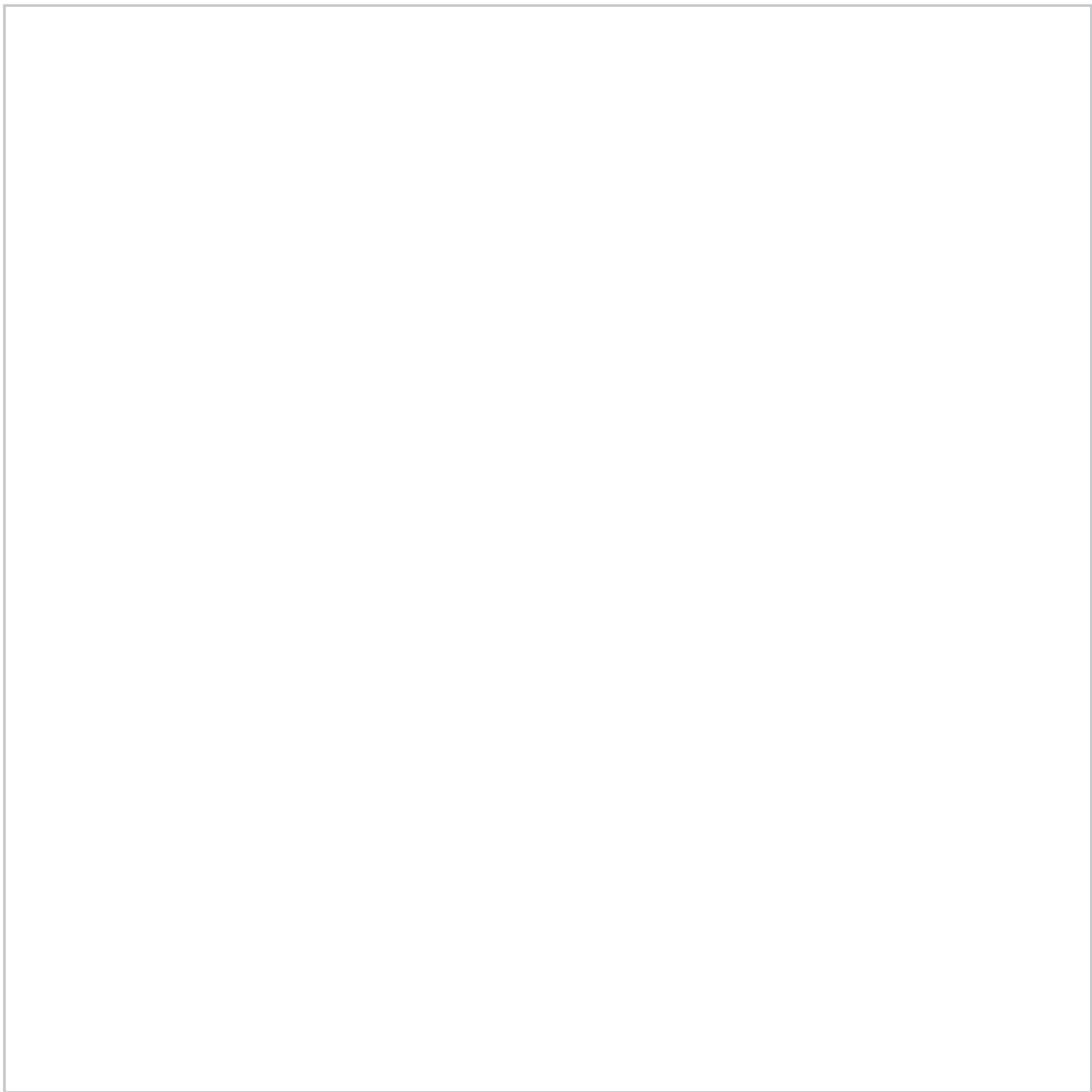
- Discuss whether the HI is comfortable fingerspelling some words to convey specific concepts for the DI to produce the sign meaning from an array of different ASL signs at their disposal.

**At the end of the assignment - Debriefing to discuss:**

Debriefing after an assignment as a team allows both DI/HI to provide feedback on any aspects of the assignment to make any changes or improvements, or discuss any challenging demands before going into the next assignment.

- Discuss any challenges faced by both teams from the assignment.
  - Discuss any corrections or clarifications during the interpretation process as a team during the assignment.
  - Discuss if there were any DCS – Demands, Controls, or Schemas that complicated the assignment and other changes that the teams need to make to provide message equivalence or ways to improve power dynamics that came into play.
  - Discuss whether any improvements or modifications need to be made for the pacing and feeding.
  - Discuss whether both teams were confident in the accuracy and integrity of their interpretations.
  - Discuss whether the interpretation process involved collaboration from both sides of the team.
-





## DSU Facebook Group for Interpreters

Welcome to DSU Interpreters! This group is designed to allow you to connect with other interpreters on the DSU roster for updates, announcements and coverage support!

Join Now



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You are receiving this email because you opted in via our website.

**Our mailing address is:**

Deaf Services Unlimited  
6925 Hickman Rd  
Des Moines, IA 50322-4805

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State Board of Sign Language Interpreters  
c/o Samie Patnode  
Health Licensing Office  
1430 Tandem Ave. NE, Suite 180  
Salem, OR 97301-2192  
[samie.patnode@oha.oregon.gov](mailto:samie.patnode@oha.oregon.gov)

**Re: Proposed Rulemaking - OAR 816-005-0000**

Dear Board of SLI Licensure,

My name is Melanie Deleon, I am an RID certified freelance interpreter in Oregon, and I am submitting public comment on the proposed rules for ASL interpreter licenses in the state.

First, I want to thank you, your team, and all community members for their work on and for licensure.

I am gravely concerned with licensure at this juncture. Oregon, as well as other states, are facing a major shortage of ASL interpreters, and it is predicted in the next 5-15 years to only get worse. Interpreters, like myself, with 30 years of experience are set to retire. Our interpreter training programs used to graduate 15-25 interpreters a year, with 7-12 still in the workforce after 5 years. Currently, PCC has graduated 3-5 interpreters a year for the last several years. Some of these interpreters move out of state, and some do not qualify skill wise to work.

Oregon has 209 “certified” interpreters registered with RID at the time of this letter to provide interpreting throughout the State of Oregon. Each interpreter might work to fill 0-4 ASL interpreting needs a day. ODE would have data of interpreters working in Oregon schools on how many hold an EIPA assessment score.

The U.S. Census American Community Survey (ACS) 2018-2022 estimates that in the State of Oregon there are **194,618 people** who are deaf or have serious difficulty hearing, about **4.6 percent of the population**.

I have heard from several of our currently certified and qualified interpreters that they may get the generalist license, but not the medical. They only do “a few hours” of medical interpreting a year. If more than 10 do not get their medical license and turn down those jobs, that could mean 10, 20, 30 medical appointments a week, month, year going unfilled. Unfilled appointments potentially open the medical facility to being liable for not being ADA compliant, and opens them up for a lawsuit. It means Deaf, DeafBlind and Hard of hearing citizens do not get critical medical and mental health services.

These are real impacts on real individuals.

Melanie Deleon, MS  
CI&CT, NIC,NADIV, SC:L  
Melterp@gmail.com  
503-851-2992

First Matter:

I propose that the OREGON HEALTH AUTHORITY HEALTH LICENSING OFFICE,  
STATE BOARD OF SIGN LANGUAGE adopt the following:  
Deaf Sign Language Interpreter (DSLII) Specialty License

DSLII Specialty License:

(1) A DSLII specialty license holder:

(a) May provide SLI services under the direct onsite or remote supervision of a person holding a SLI supervisory license, a SLI medical license, a SLI legal license or a SLI generalist license-

(b) May provide SLI services in an educational setting under the direct on-site supervision or indirect remote supervision of a person holding a SLI supervisory license, a SLI generalist license or SLI educational license.

(2) A DSLII specialty license is current for one year and becomes inactive on the last day of the month one year from the date of issuance.

(3) A DSLII specialty license may be renewed up to ten times or at the discretion of the board.

(4) A DSLII specialty license can apply for a Medical and Legal specialty license if they meet the education/ training requirement of those licenses.

(5) The issuance or the license holder's holding of a DSLII license does not supersede, replace, or negate the need for the license holder to comply with other laws requiring licensure or registration, or competent SLI services.

(6) A DI specialty license is for purposes of ensuring effective communication for Deaf, Hard of Hearing, Foreign born and DeafBlind Oregonians. Additionally it is to ensure cultural and linguistic competency while interpreting services are being provided, and is an authorization under ORS 676.562. Statutory/Other Authority: ORS 676.783 Statutes/Other Implemented: ORS 676.750, ORS 676.783

Application Requirements for DSLII Specialty Training License ¶¶ An individual applying for a SLI specialty training license must:¶ (1) Meet the requirements of OAR 331 division 30.¶ (2) Submit a completed application form prescribed by HLO, which must contain the information listed in OAR 331-030-0000.¶ (3) Submit proof of identity; documentation to prove identity may include identification listed under OAR

331030-0000. ¶ (4) Provide supervisor information including but not limited to name and license number on a form prescribed by the Office.

(5) Complete 4 hours of Ethics training ¶ (6) Provide a (1) letter of recommendation and support from an Interpreter referral agency, and (1) letter of support from a Supervisory Licensed Interpreter.

Statutory/Other Authority: ORS 676.771, ORS 676.783 Statutes/Other Implemented: ORS 676.750, ORS 676.771, ORS 676.783

### Rationale

HLO needs to allow Deaf interpreters, who are not yet certified, to continue working in all settings- medical, legal , educational and community. This is a new professional field for Deaf interpreters, yet one that has been in practice wherever Deaf people have gathered for centuries. Deaf people have a long history of "interpreting" for each other as the hearing interpreter/educator was not fluent or clear in ASL. These practices have deep roots in educational settings at residential schools and mainstream community based classrooms.

Making it a profession- where it is recognized and one can make a living doing it is new. So new that Oregon only has 4 RID certified Deaf interpreters. Two out of the four hold full time jobs and are not always available- FOR THE WHOLE STATE OF OREGON. Of those 4, NONE LIVE IN PORTLAND!

I personally know of one Deaf Interpreter who is fluent in Mexican Sign Language. He was able to supplement his Social Security monthly income with interpreting in a medical setting- earning upwards of \$20,000 dollars. The fiscal impact of NOT having an avenue for him to work, places him and his family back on food stamps and barely surviving. This does not even address the invaluable rare language interpreting he was able to provide in a medical setting for the state of Oregon.

There are close to fifteen Deaf Interpreters working in Oregon currently if I were to estimate. Yet these DIs are providing over thousands of hours of interpreting. If there is no way to license Deaf Interpreters, how and by whom will those hours be covered?

Additionally, we will be cutting off the pipeline for these working interpreters to make a living and continue their path to becoming certified. There is no specific curriculum for Deaf Interpreters on the West Coast, and none that are housed within an academic institution that grants financial aid, which is a privilege granted to Hearing interpreters.

Here is a report from just one small agency, there are at least 2 more ASL specific agencies in Portland, so I think we add a third more to these numbers below and be conservative. From CODAsPlus out of Vancouver who serves Portland OR primarily:

Good evening Mel

Here's my numbers from CODAs Plus for 2023

We employed 14 DI and 1 CDI (part of last year Susan wasn't certified)

We paid out a total of \$127,764.75. To DI we paid a total of \$129,334.75 for CDI and DI

That equals to about 2587 hours.

We desperately need an alternate pathway for DI.

Thank you

Luanne

\*\*\*\*\*

Second matter:

Acceptable credentials for a generalist license holder, NADIII & RSC should both be acceptable credentials. The Registry of Interpreters for the Deaf recognizes these credentials, and Oregon should be in line with national standards. To deviate from our national certifying body is negligent and will cause harm to our workforce. If you go to the RID database, ask to see "certified" interpreters, NADIII and RSC holders appear in the search. Additionally, holders of these certificates, who still practice, have years of lived work experience to draw from, and provide valuable services to our state.

Name	City	State	Zip	Email	Phone	Certificates	Additional Languages or Specialties	Category	Freelance Status
<a href="#">Cheryl Jackson</a>		Oregon		<a href="mailto:aslterp95@gmail.com">aslterp95@gmail.com</a>		CI, NAD III, CT		Certified	Yes
<a href="#">Cynthia Anderson</a>	Brookings	Oregon	97415	<a href="mailto:1cynthiiaanderson@gmail.com">1cynthiiaanderson@gmail.com</a>		CT, CI, NAD III	Medical Non-Emergency, VRS, Medical Emergency, VRI, Mental Health	Certified	No
<a href="#">Cynthia Kurle</a>	Sweet Home	Oregon	97386	<a href="mailto:cindykurle@gmail.com">cindykurle@gmail.com</a>		NAD III, NIC Advanced		Certified	No
<a href="#">Donna Bennett</a>						NAD III		Certified	No
<a href="#">Nathan Short</a>						NAD III, NIC		Certified	No
<a href="#">Stacey Stevens</a>						NAD III		Certified	Yes
1    Page Size: 10 ▼    6 items in 1 page									

While doing a search of the RID database, there are no RSC certified interpreters in the state of Oregon.

We do have 6 NADIII, 2 of which do not have other credentials that qualify them. To bar two interpreters who have well over 15 years of work experience each- who one is a CODA, seems needless and unjust. Furthermore, it will deprive people of interpreting services and one person of long term employment.

### Certificates [optional]

- |                                       |                                     |                                  |
|---------------------------------------|-------------------------------------|----------------------------------|
| <input type="checkbox"/> CDI          | <input type="checkbox"/> CI         | <input type="checkbox"/> CLIP-R  |
| <input type="checkbox"/> CSC          | <input type="checkbox"/> CT         | <input type="checkbox"/> Ed:K-12 |
| <input type="checkbox"/> EIC          | <input type="checkbox"/> ETC        | <input type="checkbox"/> IC      |
| <input type="checkbox"/> IC/TC        | <input type="checkbox"/> MCSC       | <input type="checkbox"/> NAD III |
| <input type="checkbox"/> NAD IV       | <input type="checkbox"/> NAD V      | <input type="checkbox"/> NIC     |
| <input type="checkbox"/> NIC Advanced | <input type="checkbox"/> NIC Master | <input type="checkbox"/> OIC:C   |
| <input type="checkbox"/> OIC:S/V      | <input type="checkbox"/> OIC:V/S    | <input type="checkbox"/> OTC     |
| <input type="checkbox"/> PDIC         | <input type="checkbox"/> Prov. SC:L | <input type="checkbox"/> RSC     |
| <input type="checkbox"/> SC:L         | <input type="checkbox"/> SC:PA      | <input type="checkbox"/> TC      |

### 3rd Matter:

When listing the credential of EIPA-remove "secondary". Our field recognizes and ODE recognizes the EIPA score of 3.5, or 4 and does not differentiate. Again, to maintain the same credentials with ODE, this must be removed and will have a negative impact on working interpreters currently employed with a school district. Schools already struggle to place interpreters, this could lead to situations where ODE is not in compliance and Deaf students go without services.



**From:** [Melodie Glimpse](#)  
**To:** [Patnode Samie](#)  
**Subject:** Re: SLI Interpreter Licensure Questions  
**Date:** Friday, April 12, 2024 12:18:37 PM

---

Thank you for your response.

The extension of the waivers (Provisional & Generalist), preferably to the end of the year, is with the intent to allow for time for test results to come in. Previously interpreters were deemed qualified with an EIPA score of 3.5 or higher for many settings outside of medical and legal (post secondary, K-12, theater, etc.). In order to qualify for the Specialty License they must have an EIPA score of 3.5 or higher specifically in secondary settings, for a Generalist they must have a 4.0 or higher. Many educational interpreters have tested at the elementary level, which now disqualifies them for a Generalist or Specialty License regardless of how high their score may be.

What I find even more interesting is that we, in the field of interpreting, acknowledge that it is the younger students who need the most highly skilled interpreters to be language models. Yet we are disqualifying those highly skilled interpreters from working outside of the K-12 environment by not accepting a score that was obtained to demonstrate this high skill level. It is this group of interpreters who are retesting at the secondary level, but will not have the necessary time for their results to come in prior to the June cutoff date. Currently the EIPA has a six month turn around time, and tests are scheduled months out. These highly skilled interpreters are at a severe disadvantage and may find themselves unable to continue to work in post secondary and community settings until after their results arrive later in the year. This further impacts those of us who rely on their skills and services. I beg the board, please consider the timelines for scheduling these tests, and their turnaround times for results, when considering implementation of this new licensure law.

I would also like the board to consider the requirements for the [OHA's Healthcare Interpreter Registry](#) when working to create the standards for the Medical License. Should they not work in tandem, an interpreter could easily find themselves with a Medical License only to later learn they still cannot work in medical settings.

One last note, I have been watching the [State of Oregon Health Licensing Office's YouTube channel](#) for recordings of previous meetings and have not yet seen them beyond 1/3 & 1/4. When can we expect those recordings to be available to the public for viewing?

Thank you for your time and consideration.

Best regards and be well,

Melodie Glimpse, NIC  
Certified Health Care Interpreter - Sign Language (ASL) #HCI000108258  
Oregon License: [GENTMP-10238832](#)  
ASL Interpreter  
Pronouns: she/her/hers  
Center for Accessible Resources  
Lane Community College  
4000 E. 30th Ave.  
Eugene, OR 97405  
(541) 463-5091  
[GlimpseM@lanecc.edu](mailto:GlimpseM@lanecc.edu)  
[CARserviceproviders@lanecc.edu](mailto:CARserviceproviders@lanecc.edu) (for interpreting related issues)  
<http://www.lanecc.edu/disability>

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On Fri, Apr 12, 2024 at 8:58 AM Patnode Samie <[Samie.Patnode@oha.oregon.gov](mailto:Samie.Patnode@oha.oregon.gov)> wrote:

Hi Melodie. See my responses in red.

The SLI Educational License is renewable up to 5 times. Is this with the goal of all K-12 interpreters eventually obtaining the credentials to hold a Generalist License? **Yes.**

The SLI Medical License asks for proof of one (1) of the following, RID certification OR a minimum proficiency of level 4 or Advanced through a proficiency interview. ORS 423.550 requires medical interpreters to be on the [OHA's Healthcare Interpreter Registry](#) which has its own qualifications and fees. Will the SLI Medical License replace the OHA's Healthcare Interpreter Registry or will Sign Language Interpreters who work in the medical setting be required to satisfy additional requirements (training, continuing education, fees, etc) via the registry? **No.**

*The SLI Provisional License:* many currently working interpreters are highly skilled, but do not yet have the qualifications to obtain the SLI Provisional License. This group of ethical interpreters immediately sought to rectify this by scheduling their tests as quickly as possible. Unfortunately these expensive tests are known for their slow turnaround time. With this in mind, will the board please consider extending Temporary Provisional Licenses through the end of the year to accommodate those awaiting test results? **As of June 8 there will be a Specialty Training License. Would they qualify for that license? Would they qualify for a Requirements for the Specialty Training License are on page 21 and 22 of the attachment.**

**Samie Patnode**

Policy Analyst

OREGON HEALTH AUTHORITY

Public Health

Health Licensing Office

Desk: (503) 373-1917 (preferred)

Cell: (503) 509-5592

[Samie.patnode@oha.oregon.gov](mailto:Samie.patnode@oha.oregon.gov)



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**From:** Melodie Glimpse <[glimpsem@lanecc.edu](mailto:glimpsem@lanecc.edu)>  
**Sent:** Wednesday, April 10, 2024 4:30 PM  
**To:** Patnode Samie <[Samie.Patnode@oha.oregon.gov](mailto:Samie.Patnode@oha.oregon.gov)>  
**Subject:** SLI Interpreter Licensure Questions

**Think twice** before clicking on links or opening attachments. This email came from outside our organization and might not be safe. If you are not expecting an attachment, contact the sender before opening it.

Good afternoon Samie,

I am an ASL interpreter at the post-secondary level and also coordinate interpreters at Lane Community College. I have questions about the following:

The SLI Educational License is renewable up to 5 times. Is this with the goal of all K-12 interpreters eventually obtaining the credentials to hold a Generalist License?

The SLI Medical License asks for proof of one (1) of the following, RID certification OR a minimum proficiency of level 4 or Advanced through a proficiency interview. ORS 423.550 requires medical interpreters to be on the [OHA's Healthcare Interpreter Registry](#) which has its own qualifications and fees. Will the SLI Medical License replace the OHA's Healthcare Interpreter Registry or will Sign Language Interpreters who work in the medical setting be required to satisfy additional requirements (training, continuing education, fees, etc) via the registry?

The SLI Provisional License: many currently working interpreters are highly skilled, but do not yet have the qualifications to obtain the SLI Provisional License. This group of ethical interpreters immediately sought to rectify this by scheduling their tests as quickly as possible. Unfortunately these expensive tests are known for their slow turnaround time. With this in mind, will the board please consider extending

Temporary Provisional Licenses through the end of the year to accommodate those awaiting test results?

Thank you for your time and consideration.

Best regards and be well,

Melodie Glimpse, NIC

Certified Health Care Interpreter - Sign Language (ASL) #HCI000108258

Oregon License: [GENTMP-10238832](#)

ASL Interpreter

Pronouns: she/her/hers

Center for Accessible Resources

Lane Community College

4000 E. 30th Ave.

Eugene, OR 97405

(541) 463-5091

[GlimpseM@lanecc.edu](mailto:GlimpseM@lanecc.edu)

[CARserviceproviders@lanecc.edu](mailto:CARserviceproviders@lanecc.edu) (for interpreting related issues)

<http://www.lanecc.edu/disability>

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**From:** [Nancy Kanta](#)  
**To:** [Patnode Samie](#)  
**Subject:** Medical licensing  
**Date:** Sunday, April 28, 2024 10:45:54 AM

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I checked into getting my sign language interpreter medical licensing but the classes are \$585! I cannot afford that! If this is something that is required the training should be free. Also, regarding the levels, I am 66 years old and have been interpreting for over 30 years. I do not want to be required to have to mentor interpreters. Been there, done that! Plus, I live in a small community where we do not have SLPs in this area so for whom would I mentor? I do not have the time or the motivation to do this again. Also I should not be required to move-up through these levels! It's ridiculous! If someone is a very new interpreter I can see how these levels would benefit them but not for most of us who have been interpreting for many years, have provided mentoring and have moved up through the ranks.

I do support the idea of having medical licensing and would not mind taking the classes IF they were affordable or free.

Please rethink all of this and consider those of us who have been interpreting for many, many years.

Thank you for your time.

Nancy Kanta  
RID Certified CI/CT

**From:** [Farmgirl Nig](#)  
**To:** [Patnode Samie](#)  
**Subject:** One more public comment  
**Date:** Friday, April 26, 2024 1:42:27 PM

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This is Niquita Wilkinson again. I forgot to add one more point I had.

If the RID, Registry of Interpreters for the Deaf, recognizes RID ED: K-12 as a "certified member" of RID, then the HLO should recognize the ability of RID to say who is qualified as certified or not. They are our National Organization for Sign Language Interpreters and know what skills are necessary to be qualified as a certified member.

Thank you,  
Sincerely,  
Niquita Wilkinson



**From:** [Farmgirl Nig](#)  
**To:** [Patnode Samie](#)  
**Subject:** Public comment on licensure  
**Date:** Friday, April 26, 2024 1:30:25 PM

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Oregon Health Authority  
Health Licensing Office  
C/O Samie Patnode  
1430 Tandem Ave. NE, Suite 180  
Salem, OR 97301

April 26, 2024

Dear Health Licensing Office, thank you for taking public comments regarding this serious issue of Licensure for Oregon sign language interpreters.

My name is Niquita and I am an interpreter in rural Southern Oregon. These rules will affect all the interpreters down here, no matter which area they work in, educational, generalist, or Medical.

We already have a very serious shortage of "in person" interpreters in Southern Oregon. The Deaf community and schools are often having to rely on hiring virtual interpreters, some even from out of state, for educational, community, and medical. It is not best practices for Deaf adults or students to have to use virtual as a means of good access to communication.

ASL is a 3 dimensional language forced to be in a 2 dimensional mode on a zoom screen, with glitchy technology. Wifi goes down, interpreters freeze, internet speed is too slow for clear communication. We have a much greater need for "in person" interpreters.

The following are my concerns and where I think the rules and accepted credentials should be amended and why.

1. The licensing office should not be forcing educational interpreters to become generalist or supervisor licensed. Many spend their whole careers in education. Not all people are suited to be supervisors. It takes a certain personality and

understanding of managing people to make good supervisors. Some people are drawn to supervise others and other people have no interest in that. No other professional career does that, not lawyers, not nurses, not teachers. You aren't forced into a supervisory role unless you want to apply for it.

My friend's aunt has been an RN, registered nurse, for 30 years. She has never been forced into a supervisory role. She could have applied for that and trained for that if she had wanted to, but she had no interest in being other than a regular RN. She was never obligated to become supervisor in order to keep her RN license.

2. If HLO is going to accept all the past RID certifications( no longer given out) as credentials, (CI, CT, CSC, etc ) for "generalist," then they need to be equitable and accept RID Certification Ed: K-12 as a credential too, on the accepted credentials list for generalist.

3. The Accepted Credentials list for generalist, needs to omit the word "secondary" and accept all EIPA 4.0 and above. The EIPA performance exam tests for the same 4 Roman categories on both primary and secondary tests. Either an interpreter demonstrates they have these skills or they don't. Currently one of my assignments is in 6th grade. This is primary level. The lectures are on mitosis, meiosis, mitochondria, ribosomes, lysosomes, cellular membranes, etc, and waxing gibbous, waning gibbous phases of the moon, climate change etc.

These 4 Roman categories are as follows, that the EIPA tests for, in both primary and secondary levels.

EIPA Performance Test Domains:

Roman I - Voice to Sign = Prosody, Space, & Grammar ,10 - 12 rated skills

Roman II - Sign to Voice = Interpreting a Student, 10 rated skills

Roman III = Vocabulary and Fingerspelling, 9 rated skills

Roman IIII - Overall Factors = Cohesion, Discourse, 7 rated skills

If HLO doesn't amend the accepted credentials list and omit the word "secondary" then the interpreters who have been interpreting and mentoring for years, can't get generalist and then can't continue to mentor new young interpreters fresh out of school.

There is already a serious paucity of community, educational, and medical interpreters all over Southern Oregon. The new HLO rules would greatly reduce the already very insufficient "in person" interpreter pool.

It will definitely also diminish the pool of freelance interpreters if all EIPA 4.0 and above aren't allowed to apply for the generalist license. Many of the educational interpreters do community interpreting during their breaks and during summer and even during the school year at times. Accepting all EIPA 4.0 and above would allow them to apply for generalist and would keep the educational interpreters available to the Deaf community during the year. They've been doing freelance for years during the summer and school breaks.

4. Have one license and then show what endorsements you have on that one license, instead of having several different licenses. Make the renewal requirements less often. Maybe renew every 2 to 4 years. And the cost is very prohibitive for many interpreters.

While I understand and respect the need to raise the bar for quality interpreters for the Deaf community in Oregon, the HLO must not make the mistake of destroying the interpreter pool in Oregon that is already sparse. The HLO and Rules Committee need to revisit some of the unintended consequences of some of those decisions that were already made, and amend them before June 8, 2024.

Thank you for listening to my concerns.

Sincerely,  
Niquita Wilkinson  
Eagle Point, OR

**From:** [Farmgirl Nig](#)  
**To:** [Patnode Samie](#)  
**Subject:** One more public comment  
**Date:** Friday, April 26, 2024 1:42:27 PM

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This is Niquita Wilkinson again. I forgot to add one more point I had.

If the RID, Registry of Interpreters for the Deaf, recognizes RID ED: K-12 as a "certified member" of RID, then the HLO should recognize the ability of RID to say who is qualified as certified or not. They are our National Organization for Sign Language Interpreters and know what skills are necessary to be qualified as a certified member.

Thank you,  
Sincerely,  
Niquita Wilkinson

To whom it may concern,

I am writing this letter as a southern Oregon interpreter with my concerns about the licensure. I have been working in southern Oregon for 7 years. I am concerned about the negative impact the proposed rules will have on our small rural community. There already are not enough interpreters here to do the work and know that some of the newly proposed rules will put too much of a barrier for many to continue to work.

My first concern is the requirement of an EIPA score of 4.0 **secondary**. Both secondary and primary assessment in the EIPA look at the same skill set. The requirement should be EIPA score 4.0. We will not have enough supervisory licensed interpreters to oversee the Speciality Training licenses on site and this will negatively impact the students in K-12 setting.

My second concern is that of the renewal policy. The limited number of renewals is a concern for the Generalist license. As the law is currently written, the Generalist license can only renew twice before a Supervisory license is required. Not all Generalist interpreters want to or have the skill set to be supervisors and that should not be forced upon them. Not all K-12 interpreters want to become or have the skills to be Generalist/Supervisors. A nurse can just stay a nurse, they don't have to move up the ranks or change jobs titles. A lawyer isn't required to get different licenses to become a judge. I feel there should not be a limited number of renewals but something like retesting for EIPA or CEUS to prove you still have what it takes to keep the license you already have. Once again the negative impact of these rules will be detrimental to small rural communities.

My third concern is as the law is written now all of RIDS certifications that are retired are accepted except for the RID K-12 certification. Many interpreters who are highly skilled and have been interpreting for 30+ years now no longer satisfy the requirements for licensure.

Thank you for your hard work.

Warmly,  
Isabelle Tower  
EIPA 4.1  
7 years in the interpreting field  
AA in applied science from the SLIP at PCC

State Board of Sign Language Interpreters  
c/o Samie Patnode  
Health Licensing Office  
1430 Tandem Ave NE Suite 180  
Salem, OR 97301-2192

April 27, 2024

Re: Proposed Rulemaking – Oregon Revised Statutes Chapter 676.750-789 and 676.992

Dear Board of SLI Licensure,

My name is Rebecca Emmert. I am a RID CI Certified freelance interpreter who has a BS in ASL/English interpreting and has been interpreting in Oregon for 22 years. I am submitting public comment on the proposed rules for ASL interpreter licenses in Oregon.

Thank you for the work you are doing to establish the rules and processes for licensure for our field. Your effort is appreciated. I support the move towards requiring licenses for American Sign Language/English interpreters in Oregon. I have a few requests and concerns that I will share below. Thank you for allowing for public comment during this process.

My first concern is cost. I know this process will require funding to establish and maintain. My concern is that if the fees are too high, it will discourage interpreters from working in the field. In addition to being a certified interpreter myself, I have several years of experience coordinating ASL/English interpreters – for vocational and youth transition services in Salem, for Portland Art Museum, and for a variety of community plays and events from 2008-present. I have frequently experienced not being able to find qualified, available interpreters, even with a reasonable amount of advance notice.

Many interpreters chose to work in salaried positions in K-12, medical, legal, or video relay service settings. I understand the need for reliable hours, good pay, and benefits. However, this means that community interpreting needs often go unmet. My concern is that if the process is too cumbersome, long, complex, or expensive that interpreters will shy away from completing it and we will experience an even greater lack of available qualified interpreters.

Many of us work in more than one field and carry multiple certifications that require annual continuing education and frequent certification renewal which are expensive. Some of us seasoned interpreters do not interpret full time for a variety of reasons, but continue to remain certified and active and fill special interpreting assignments. I'll share my personal experience as an example.

I sustained a traumatic brain injury leading to vision and hearing loss in an automobile accident. Due to an accompanying neck injury, I have to limit how long I interpret and what type of interpreting I do – I can no longer do PTASL. I can't hear well enough to do platform

interpreting. However, my training as a Certified Rehabilitation Counselor and experience in mental health counseling along with my work in youth transition have uniquely prepared me to work with Deaf youth who experience language deprivation and mental health needs. Although interpreting is no longer my main profession, I enjoy these specialized settings and try to be available in situations where other interpreters haven't been available.

My annual cost for maintaining my dual certifications, paying for continuing education courses, paying membership dues at the state and federal level, and paying for liability insurance is already so high that most years it is greater than the money I make from accepting these occasional assignments. In the current economy, and as a Disabled individual that has high medical costs, it will be difficult for me to pay even greater fees. I don't want to face the choice of having to not continue working in this field because I can't afford all of the fees.

My second concern is that the proposed rules and processes, to the best of my understanding, do not take into account the unique needs of Deaf interpreters. There are already so few Deaf interpreters available, that it will be very impacting if it is extremely difficult for Deaf interpreters to navigate the licensure process.

I know multiple Deaf interpreters plan to submit feedback and I defer to their expertise. I ask that the board carefully considers their guidance, continues to work with Deaf interpreter consultants, and ensures that all portions of the licensing process are accessible to both hearing and Deaf interpreters.

Another concern I have is using the ASLPI as a measurement of interpreting skill. While language fluency is obviously very important, the other required certifications test interpreting skills including language fluency and I find the ASLPI to be a poor indicator of interpreting skills. I believe it adds a great burden of time and cost that outweigh any added value it brings to the licensing process. Especially for the medical interpreting license, other assessments of related knowledge would be much more effective. (Training in medical terminology and medical science, understanding HIPPA policies and processes, understanding safety (blood borne pathogens, de-escalation skills, understanding the impact of drugs and alcohol, understanding mental illness, etc.)

Another topic that concerns me is that there is a great discrepancy between urban and rural areas and I worry that some of the proposed requirements will result in Deaf consumers in rural areas having even less language access. This is concerning for all rural interpreting needs, but especially for educational settings. I worked with several Deaf youth who attended rural districts who were never provided an interpreter their entire education. This was a great disservice to the students and created life-long, negative impacts.

While ideally, truly fluent ASL users who are certified and experienced interpreters would be the ones working in school settings providing interpreting and being a language model to these students, they may not be available in rural areas. Having a less experienced interpreter who is still trained and is being supervised and mentored so they can grow their skill would be a much better alternative than having no interpreter. It is my recommendation that you consider

allowing Provisional License holders to interpret in K-12 settings, if they have an EIPA of 3.5 or have RID NIC or RID CI, have the required formal education, and are working with a supervisor offsite. I specify offsite because these rural areas likely won't have supervisors available onsite. However, with the use of technology, qualified supervisors could connect and provide support allowing the interpreter to remain in the rural setting and still further develop their skills.

Thank you again for your consideration of all the community input you receive and for approaching the details of this license carefully, consistently considering the impact each aspect will have on the Deaf/DeafBlind/hard of hearing/late deafened Communities in Oregon.

Sincerely,

A handwritten signature in cursive script that reads "Rebecca Emmert". The ink is black and the signature is fluid and legible.

Rebecca Emmert CI, CRC  
[rebeccaemmert@gmail.com](mailto:rebeccaemmert@gmail.com)



**From:** [Sara Hague](#)  
**To:** [Patnode Samie](#)  
**Subject:** Rules comments  
**Date:** Tuesday, April 2, 2024 9:59:08 PM

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Hello, Samie,

The rules links are not opening in any browser. I had them open briefly, but now they won't open. Could you send either the attachments or the text? Forgive me if my questions will be answered by a closer look, but I have been trying to get them to open all day.

Could you clarify if there are changes to the requirements for each of the licensures mentioned? Or will the requirements posted for temporary licensures match the requirements for the actual licensures moving forward? These additional requirements (CASLI, EIPA, SLPI, etc.) should be considered in the overall financial impact statements as well if they are also required for licensure. Some of these requirements are already impossible to fulfill within the timeline on the basis of drastically delayed testing feedback. This has a huge impact on the number of available interpreters at and after the deadline.

The actual cost of the licensures seems reasonable depending on how long licensure lasts. Is this yearly? Would medical licensure be concurrent with OHA's qualification/certification 4-year cycle? And would it align with the same requirements? Is there going to be a qualification/certification medical provision?

Because of the timing of these meetings, it is impossible to be present for the entire meeting. I have been checking for the posted meeting recordings on YouTube, but still only see recordings from January, not the most recent meetings. Will these be posted ASAP so we can stay abreast of changes in a more timely fashion? I am especially concerned about the plan for provisional licensures or training licensures for rural interpreters who are currently handling almost full time work and have no way of jumping through all of the hoops by June 7th because of the significant delays in test results. Some of these interpreters are also depended on by a large number of deaf consumers who request them because of their skill. Is there any provision for Deaf or Hearing interpreters who are still working on attaining the required pieces, but may be the only ones requested by deaf consumers or only qualified fit in our area for very specific reasons? (DeafBlind interpreting skills, severe trauma, limited language skills, etc.) Obviously many Deaf and hearing consumers are concerned that securing an interpreter will be even more difficult or impossible. This has a huge negative impact on accessibility.

The overall aim to improve quality of service to consumers is so commendable, but once again, it seems our state has put the cart before the horse. We simply don't have enough skilled interpreters to cover existing needs, nor do we have enough financial help/incentives to

help skilled but non certified interpreters get the necessary experience or proofs of skill. Raising the bar without providing support or a timely plan to step up, is going to hurt existing interpreters as well as Deaf consumers and make our field less enticing for new skilled workers to join. I am hopeful that the bits and pieces I heard about provisional and training licenses will be part of the solution. These pieces are essential to include.

Finally, how will the state scheduling and paying directly for medicaid funded interpreter assignments impact all of this? I have a feeling there are more details to work through, but it also seems that requirements for all of these pieces need to align.

Sara Hague  
ASL Interpreter  
541-653-7424

**From:** [Sarah Young](#)  
**To:** [Patnode Samie](#)  
**Subject:** Public Commet SLI  
**Date:** Wednesday, April 24, 2024 12:26:06 AM

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State Board of Sign Language Interpreters  
c/o Samie Patnode  
Health Licensing Office  
1430 Tandem Ave. NE, Suite 180  
Salem, OR 97301-2192  
[samie.patnode@oha.oregon.gov](mailto:samie.patnode@oha.oregon.gov)

## **Re: OAR 816-025-0070 - SLI Licensure**

Dear Board of SLI Licensure,

My name is Sarah Young and I am an RID certified hearing interpreter in Oregon, submitting public comment on the proposed rules for ASL interpreter licenses for the State of Oregon. Currently, I work as a full time staff interpreter for a local agency and work predominantly in medical and healthcare settings.

As a certified and supervisory licensed medical interpreter I am writing to urge HLO and the board to allow Deaf Interpreters (DI) who are not yet certified to continue to work in all settings, general, education, legal and medical. Due to the limited amount and availability of CDI's there are not enough CDI/DI's to fill all the necessary appointments in Oregon. Currently, Deaf Interpreters are working thousands of hours a year, and CDI's and DI's together are still not filling all the requests in our state and this has a real impact on the Deaf and interpreting communities.

Under licensure for medical (and legal) appointments, the ability of adding DI's when needed to act as a vital part of the communication team is vital to meet the unique language needs of Deaf, DeafBlind and Hard of Hearing (DDBHH ) Oregonians will not be allowed to work unless they follow the path laid out for Hearing interpreters. I urge the Board and HLO to recognize the difference in lived experience, visual gestural intuition, training and testing opportunities and availability,between Deaf Interpreters(DI's) and Hearing Interpreters(HI's.) I urge the development of a Specialty Deaf Interpreter license that will allow DI's to continue to serve a vital role for communication access to the DDBHH communities when needed and continue to grow this vital profession.

To support this I would like to note that I have serious concerns about how SLI licensure currently is in conflict with the Registry of Interpreters for the Deaf (RID) Code of Professional Conduct (CPC). Licensure, as written, limits options for HI and Healthcare professionals to use DI's when DCI's are not available to provide effective communication as defined under the ADA. I also have concerns about how licensure limits meaningful and vital employment opportunities for Deaf individualsand puts barriers on accessing interpreters for individuals who have unique communication and language access needs.

First, the RID Code of Professional Conduct (CPC).

RID Certified ASL interpreters are bound to the CPC by our RID certification and also by Licensure in Oregon as listed under rule 816-065-0000. As it is currently written, I see it as against the professional standards of ASL interpreters. Under principle 2 of the RID CPC we are “expected to stay abreast of evolving language use and trends in the profession of interpreting as well as in the American Deaf community. Interpreters accept assignments using discretion with regard to skill, communication mode, setting, and consumer needs.” The trend of the profession is using CDI’s and DI’s when needed for effective communication, and this is considered best practice.

[\(Link to CPC\)](#)

#### **Code of Professional: Professionalism**

##### **Guiding Principle 2: Interpreters are**

**2.2 Assess consumer needs and the interpreting situation before and during the assignment and make adjustments as needed.**

**2.3 Render the message faithfully by conveying the content and spirit of what is being communicated, using language most readily understood by consumers**, and correcting errors discreetly and expeditiously.

**2.4 Request support** (e.g. certified deaf interpreters, team members, language facilitators) **when needed to fully convey the message or to address exceptional communication challenges (e.g. cognitive disabilities, foreign sign language, emerging language ability, or lack of formal instruction or language).**

**2.6** Judiciously **provide information or referral regarding available interpreting or community resources** without infringing upon consumers’ rights.

##### **Guiding Principle 4: Respect for Consumers**

**4.1 Consider consumer requests or needs regarding language preferences, and render the message accordingly** (interpreted or transliterated).

As a Qualified Mental Health interpreter I want to emphasize the importance of allowing medical and legal teams to make decisions on a case by case basis to meet the unique communication needs of Oregonians experiencing a mental health crisis or diagnosis. The Qualified Mental Health Interpreter website states “the quality of interpretive services has a substantial and direct bearing on the outcome of *appointments* and can have life-or-death consequences when the interpretation is inaccurate “or ineffective.

Furthermore, I am concerned because of the limit this will place on professionals to decide and employ effective communication, as defined under the ADA. The ADA emphasizes that **“Effective communication is particularly critical in health care settings where miscommunication may lead to misdiagnosis and improper or delayed medical treatment.”** Oftentimes DI’s are critical in ensuring effective communication for critical care or treatment and calling in these professionals as needed is considered best practice.

#### [ADA Effective Communication Citation](#)

“The ADA requires that title II entities (State and local governments) and title III entities (businesses and nonprofit organizations that serve the public) communicate effectively with people who have communication disabilities. The goal is to ensure that communication with people with these disabilities is equally effective as communication with people without disabilities.

- 

Covered entities must provide auxiliary aids and services when needed to communicate effectively with people who have communication disabilities.

- 

The key to communicating effectively is to consider the nature, length, complexity, and context of the communication and the person’s normal method(s) of communication.

A “qualified” interpreter means someone who is able to interpret effectively, accurately, and impartially, both receptively (i.e., understanding what the person with the disability is saying) and expressively (i.e., having the skill needed to convey information back to that person) using any necessary specialized vocabulary.”

Effective communication for appointments is the key here and currently there are 4 CDI in the entire state of Oregon, and one in SW Washington and not all of them are working full time as CDI’s. There are not enough CDI’s in Oregon to meet the unique language needs and fill appointments for the entire state. Currently under licensure non certified Deaf interpreters will not be allowed in medical or legal settings where they can be critical for the medical and legal teams.

Some considerations and times when CDI/DI’s might be beneficial to health care appointments and other settings might be D/deaf youth who are not fluent in ASL or another signed language, someone experiencing psychosis or a mental health emergency, a sign language user who who is intellectually or developmentally disabled, someone using non-standard American Sign Language (ASL) or a unique dialect of ASL, tactile or ProTactile, a deaf person who uses a foreign sign language, complex medical or legal situations with potentially life changing consequences, a deaf person overwhelmed by the pace of the interpreting process and many more situations. **As professional interpreters if we do not have the option of requesting to work with DI if needed for vulnerable populations it could have serious and long lasting impacts on the Deaf patients we work with.**

Interpreting for individuals with Language deprivation, language dysfluency and poor health literacy are everyday experiences for ASL interpreters. Working with Deaf interpreters or Certified Deaf interpreters is considered best practice in these situations and is one of the best tools medical and legal teams have to meet the unique language needs of deaf consumers and provide access to effective communication.

di;a

If you are unsure why there is the need for DI’s Imagine an experience where language access is not guaranteed at birth or within your own immediate family. It is estimated that around 90% of D/deaf children are born into hearing families. NAD, the National Association for the Deaf estimates that around 70% of hearing families do not learn to sign. That means those children do not have access to language in their homes and with their families. That number is estimated to be even less in BIPOC communities. For a D/deaf child this may mean their parents, siblings, aunts, uncles and cousins may not share the same language and culture as they do. This can result in Language deprivation, language deprivation syndrome, language dysfluency, poor health literacy and little to no knowledge of family health history. ASL interpreters encounter this often in these situation it is considered best practice to to work with DI/CDI’s in these situations.

Oregonians use Mexican, Russian, Ukrainian, Korean and other signed languages and there are DI's in Oregon with this unique skill set to communicate with languages of lesser diffusion and they will not be able to work with patients when needed under licensure. In these situations HI's alone struggle to establish effective communication. Let alone effectively interpret complex healthcare procedures, the death and dying- including hospice and palliative care, a potential cancer diagnosis or diabetes care and treatment. These explanations can be incredibly emotional, complex and highly detailed. We need to ensure healthcare teams can make decisions on a case by case basis to meet the unique language needs of signed languages of lesser diffusion here in the states and those teams have the **option** of using a non certified Deaf interpreter to provide cultural mediation and effective communication as appropriate.

Because of their lived experience training and experience with visual and gestural communication, even without certification, these Deaf individuals can offer a "linguistic and cultural bridging that is often not possible when hearing ASL-in English interpreters work alone." [\(DII\)](#)

Additionally, the SLPI or ASLPI is now being required to prove fluency in American Sign Language so HI's can interpret in the medical field yet in the same license those who are fluent in American Sign Language, but not yet certified DI's are being left out medical teams that need them. There is an opportunity here to encourage DI's to work with HI's to partner and support each other. We can encourage partnerships between pre certified DI's and Supervisory interpreters to allow Deaf interpreters to support hearing interpreters ASL fluency while providing a more clear interpretation into English and ASL. This is a win-win for Deaf and hearing interpreters and medical/legal teams while also providing more effective communication and supporting better health outcomes for deaf individuals. This is also an opportunity to provide teaming opportunities for DI's to develop skills that could lead to certification, and more Certified Deaf interpreters in the future.

It is also important to note that the EIPA, one of the tests to move up the chain of licensure is NOT available to Deaf individuals. The EIPA only allows testing for hearing individuals and is available in multiple locations in many states. The BEI, another path to Certification, is only available in the state of Texas. Costs of travel and lodging in addition to testing costs to take this exam could be a barrier to accessing this test. It is important to note the inequitable access to testing for licensure for Deaf interpreters.

For the reasons above I urge the board to write a separate DI license so we can allow a path to professional licensure that considers the needs of the community, unique skill set and training opportunities for DI's and takes into consideration the difference

in testing opportunities allowing for a more equitable and appropriate pursuit to licensure. It is critical that under licensure we allow legal and medical teams the flexibility to meet the needs of EACH individual Oregonian. We must allow the critical work that DI's do in legal and medical settings to continue.

SLI Specialty License Example:

(1) A DSLI specialty license holder:

(a) May provide SLI services under the direct on-site or indirect remote supervision of a person holding a SLI supervisory license, a SLI medical license, a SLI legal license or a SLI generalist license.

(b) May provide SLI services in an educational setting under the direct on-site supervision or indirect remote supervision of a person holding a SLI supervisory license, a SLI generalist license or SLI educational license.

(2) A DSLI specialty license is current for one year and becomes inactive on the last day of the month one year from the date of issuance.

(3) A DSLI specialty license may be renewed up to ten times or at the discretion of the board.

(4) A DSLI speciality license can apply for a Medical and Legal specialty if they meet the OHA 60 hour training, and other legal specifications under licensure

(5) The issuance or the license holder's holding of a DSLI license does not supersede, replace, or negate the need for the license holder to comply with other laws requiring licensure or registration, or competent SLI services.

(6) A DI specialty license is for purposes of ensuring effective communication for Deaf, Hard of Hearing, Foreign born and DeafBlind Oregonians. Additionally it is to ensure cultural and linguistic competency while interpreting services are being provided, and is an authorization under ORS 676.562. Statutory/Other Authority: ORS 676.783

Statutes/Other Implemented: ORS 676.750, ORS 676.783

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Sarah Young

[young.sarahd@gmail.com](mailto:young.sarahd@gmail.com)

RID Nationally Certified ASL/English Interpreter

HIPAA Certified

Qualified Mental Health Interpreter (QMHI)

Oregon Certified Healthcare Interpreter (OCHI)

CoreCHI™

she/her/hers





**From:** [Edwards Carrie](#)  
**To:** [Shawn Sloan](#)  
**Cc:** [Patnode Samie](#)  
**Subject:** RE: Public comment Board of Sign Language Interpreters 4/10  
**Date:** Tuesday, April 9, 2024 3:12:16 PM  
**Attachments:** [SLI-RAC Meeting Notice Agenda-4-10-2024.pdf](#)

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Thank you and you are welcome to present this during the Public and Interested Parties Feedback section indicated on the attached Committee agenda for 4/10.

Thank you,  
Carrie Edwards

---

**From:** Shawn Sloan <[sloanstudios@gmail.com](mailto:sloanstudios@gmail.com)>  
**Sent:** Tuesday, April 9, 2024 2:25 PM  
**To:** Edwards Carrie <[Carrie.Edwards@oha.oregon.gov](mailto:Carrie.Edwards@oha.oregon.gov)>  
**Subject:** Public comment Board of Sign Language Interpreters 4/10

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"Hello, my name is Shawn Sloan and I am a WOU graduate from 2020's ITP program. I wanted to offer my perspective to the board as I am three to four years into the profession and feel there are some specific things that the board could do to help interpreters like me bridge the dreaded "gap."

CASLI recently modified the NIC tests to reflect real world interpreting knowledge instead of purely academic knowledge. To acquire enough real world experience sufficient to pass the revised NIC interpreters need thousands of hours of real life hands-up time but getting that time without negatively impacting the community is ethically challenging. That being said I still think there is a tenable solution to this dilemma.

Data-driven Accountability.

Firstly, as a new interpreter I absolutely never accepted solo assignments. Working with a team provided me with real time accountability and filled in gaps in my understanding while minimizing any negative impact to the consumer. My suggestion would be to require all probationary interpreters accept only teamed assignments. Even with this limitation it was never a challenge for

me to achieve a 20-30 hour a week schedule.

Secondly, I would ask that we require probationary interpreters to log their hours and submit them electronically every quarter, including the number of hours worked and the setting they are working in. This data could then be compiled and provided to the board to inform a set of benchmarks for all probationary interpreters to follow. Requiring they take (pass or fail) the NIC knowledge/ethics test before their 500th hour, performance test (pass or fail) every 1500 hours (1 year of part time equivalent), and so on.

Lastly, the board would be able to archive this data and use it to evaluate the efficacy of CEU requirements, mentorship requirements, and other PD options on shortening the gap from ITP to Certification in the future.

Thank you for your time."

**From:** [Hoover Sheila R](#)  
**To:** [Patnode Samie](#)  
**Subject:** RE: Public Comment Verification  
**Date:** Friday, April 12, 2024 2:06:24 PM

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Let's go with this slightly edited version:

In reading the proposed rules and seeing the requirement to meet the criteria in the Chapter 331-Division 30 rules, I see that that background checks **"may"** be required ([331-030-0004](#)), but I can't see anything in the proposed OARs that background checks **WILL** be required for SLI applicants/licensees.

As so many of our Deaf and DeafBlind citizens are vulnerable to abuse of many types, those background checks are one way to ensure the services provided by SL interpreters do not pose undue risk.

Additionally, Oregon DHS-Vocational Rehabilitation (VR) policy requires all SLIs to demonstrate that they have completed a background check or to work with the VR State Coordinator for Deaf & Hard of Hearing Services to complete one through the ODHS/OHA Background Check Unit. If the SLI Board's OARs include background checks as a **requirement**, that would allow VR to use **any** state-licensed interpreter, not the smaller pool of folks who have been through the background check process. This, in turn, would allow VR staff to avoid delays in services to Oregonians and support Deaf Oregonians to attain their employment goals.

Sheila Hoover, MA, CAGS, CRC, CVE  
State Coordinator for Deaf & Hard of Hearing Services  
ODHS-Vocational Rehabilitation  
[Sheila.r.hoover@odhs.oregon.gov](mailto:Sheila.r.hoover@odhs.oregon.gov)

---

**From:** Patnode Samie <[Samie.Patnode@oha.oregon.gov](mailto:Samie.Patnode@oha.oregon.gov)>  
**Sent:** Friday, April 12, 2024 1:18 PM  
**To:** Hoover Sheila R <[SHEILA.R.HOOVER@odhs.oregon.gov](mailto:SHEILA.R.HOOVER@odhs.oregon.gov)>  
**Subject:** Public Comment Verification

Please verify this is the public comment you want going to the Board for consideration.

April 14, 2024, 4:14 PM Hoover Shelia R  
Hi Samie--Sheila Hoover here from ODHS-Vocational Rehabilitation with a question about the proposed OARs for the SLI Board. In reading the proposed rules and seeing the requirement to meet the criteria in the Chapter 331-Division 30 rules, I see that that background checks **"may"** be required ([331-030-0004](#)), but I can't see anything in the proposed OARs that background checks **WILL** be required for SLI applicants/licensees. Has there been a decision on that? VR policy requires all SLIs to have completed a background check or to work with me to complete one through the ODHS/OHA Background Check Unit. I'm hoping those checks will be required--if I can get

confirmation that there is the same requirement for the new licensure process (even a "one and done" as is in place for most ODHS-OHA staff positions), that will allow VR to use **any** state-licensed interpreter, not the smaller pool of folks who have already been through the background check process. Can you help? We're rolling out a new edition of our Deaf & Hard of Hearing Services policy in May and I'd love to be able to include this in that updated policy guidance.

April 12, 2024, [9:57 AM] Hoover Sheila R

Yes please! That would be fantastic. As so many of our Deaf and DeafBlind citizens are vulnerable to abuse of many types, those background checks are one way to ensure the services provided by SL interpreters do not pose undue risk.

**Samie Patnode**

Policy Analyst

OREGON HEALTH AUTHORITY

Public Health

Health Licensing Office

Desk: (503) 373-1917 (preferred)

Cell: (503) 509-5592

[Samie.patnode@oha.oregon.gov](mailto:Samie.patnode@oha.oregon.gov)



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**From:** [Stephanie](#)  
**To:** [Patnode Samie](#); [Stephanie cell](#)  
**Subject:** Medical interpreter license concerns  
**Date:** Thursday, April 18, 2024 1:33:58 PM

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Hello Samie,

I am a professional sign language interpreter . I have an AAS in interpreting and have been working in the field for over 30 years .

I currently hold two national certifications from the Registry of interpreters of the Deaf , RID CI and RID CT . This national certification required a written knowledge exam and a performance exam . I am required to provide 80 hours of Continuing Education units every four years and it costs \$220 to maintain .

I also hold a current Oregon Health Care Certification. I did the 60 hours of medical training and met the requirements necessary. In addition, I have a temporary Oregon generalist license and an Oregon temporary Medical license . I carry liability insurance each year to work in my field which is \$300 annually.

I have dues to be a member of our local ORID \$45 a year plus the cost of all workshops which now often includes travel and hotel .

I work full time in person in medical settings . I have over 30 years experience working in various settings with our Deaf community . I love my job and love my Deaf community .

Unfortunately, with so many new requirements, many which are redundant, and expensive in comparison to other states , I am hearing of several highly skilled interpreters saying they will have to leave the medical field of interpreting. This is heartbreaking and will ultimately harm the Deaf community . We are already so short staffed in medical interpreting settings . I believe the laws were created to protect the Deaf community and with good intentions , but unfortunately, the current rules and regulations and costs are harming our interpreting and Deaf communities .

The addition of the ASLPI is a big concern. This testing does not evaluate our interpreting skill . It is to assess conversational skills . We already have a costly and comprehensive skills evaluation in place through our RID exam .

I am asking that the ASLPI be removed from our requirement to obtain OHCIC as well as Oregon licenses . Holding National certification already proves fluency.

Thank you for your time and attention to this matter.

Stephanie Greene  
American Sign Language Interpreter

RID Nationally Certified  
CI and CT  
Oregon Health Care Interpreter Certified  
Oregon Medical license

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**From:** [Wendel Laura A](#) on behalf of [HCI Program](#)  
**To:** [Patnode Samie](#)  
**Subject:** FW: ASL PI concerns  
**Date:** Friday, April 19, 2024 4:13:42 PM

---

We received this in our inbox. Thank you.

---

**From:** Stephanie Greene <[stephaniegrne@msn.com](mailto:stephaniegrne@msn.com)>  
**Sent:** Thursday, April 18, 2024 6:31 PM  
**To:** HCI Program <[HCI.Program@odhsoha.oregon.gov](mailto:HCI.Program@odhsoha.oregon.gov)>  
**Subject:** ASL PI concerns

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I have dues to be a member of our local ORID \$45 a year plus the cost of all workshops which now often includes travel and hotel .

I work full time in person in medical settings . I have over 30 years experience working in various settings with our Deaf community . I love my job and love my Deaf community .

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The addition of the ASLPI is a big concern. This testing does not evaluate our interpreting skill . It is to assess conversational skills . We already have a costly and comprehensive skills evaluation in place through our RID exam .

I am asking that the ASLPI be removed from our requirement to obtain OHCIC as well as Oregon licenses .

Thank you for your time and attention to this matter.

Stephanie Greene

American Sign Language Interpreter

RID Nationally Certified

CI and CT

Oregon Health Care Interpreter Certified

Oregon Medical license

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**From:** [Summer](#)  
**To:** [Patnode Samie](#)  
**Subject:** Sign Language Interpreters Proposed Administrative Rules - Public Comment  
**Date:** Monday, April 1, 2024 3:20:44 PM

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Samie Patnode;

Thank you for your time. I am writing to address my opposition to the recently added Sign Language Proficiency Interview (SLPI) requirement for Sign Language Healthcare Interpreters.

I have been a professional ASL interpreter for twelve years, have been nationally certified (NIC) via the Registry of Interpreters for the Deaf (RID) for eleven years, have been an Oregon Certified Health Care Interpreter (HCI) for six years, and have held a national Core Certification Healthcare Interpreter (CoreCHI) certification via the Certification Commission for Healthcare Interpreters (CCHI) for five years. I also currently hold a temporary license from the Oregon Health Authority for both supervisory and medical sign language interpreting.

I believe the council recommended the SLPI with good intentions; however, it seems you were unaware that we already have a language assessment, which is our national certification through the Registry of Interpreters for the Deaf (RID). RID partners with the Center for Assessment of Sign Language Interpretation (CASLI) to administer the exams.

This national assessment is divided into two separate exams: the knowledge exam and the performance exam. The knowledge exam has two categories, the Fundamentals of Interpreting and Ethics, and Cultural Responsiveness. The knowledge exam must be passed before applying to take the performance exam. The performance exam requires the candidate to interpret multiple scenarios while being recorded. The recording is then sent to a panel to be rated. The exams are very stringent, comprehensive, and unlike the SLPI, the RID exam assesses both language proficiency AND interpreting. (See supporting documentation below.)\*

The Sign Language Proficiency Interview (SLPI) is typically 15-20 minutes and only assesses a person's light, casual conversational skills, which is extremely different from interpreting skills.

Since the Oregon Health Authority already requires both certified and qualified Healthcare Interpreters to hold National Interpreter Certification through RID, the SLPI is unnecessary and poses a risk of creating additional barriers to interpreter access for the Deaf community.

Please help us to reduce barriers, and therefore harm to the community, as well as costly redundancies, by recommending the SLPI requirement be removed for Sign Language Healthcare Interpreters.

I have heard that previous public comments were not shared with the full council. To alleviate public concern, please send all public comments to the full council as soon as possible so these important matters can be addressed.

Thank you,  
Summer  
-----

Summer Nunn, NIC, CoreCHI, OHCI  
Nationally Certified ASL/English Interpreter  
Certified Healthcare Interpreter  
(she/her)



\*Please see the following from CASLI's website for more detailed information on their NIC testing for RID  
([https://drive.google.com/file/d/1AlRkI8vhwQrOwlX12e\\_5Rsxh8vgqHmUN/view](https://drive.google.com/file/d/1AlRkI8vhwQrOwlX12e_5Rsxh8vgqHmUN/view)):

## CASLI Exam Content Outline and Preparation Guide

### CASLI Generalist Exam Philosophy

The [Center for the Assessment of Sign Language Interpretation](#), CASLI, administers the Generalist Knowledge and Generalist Performance Exams which are used by the [Registry of Interpreters for the Deaf \(RID\)](#) to determine eligibility for their two national certification programs: the [Certified Deaf Interpreter, CDI](#), and the [National Interpreter Certification, NIC](#). The exams assess the knowledge, skills, and abilities (KSAs) an ASL interpreter should have to competently work in typical, non-specialized, interpreting settings.

The exams use a practice-based approach. This means that the exams focus on competencies such as language comprehension and fluency, knowledge of interpreting practices and skills, ethical decision making abilities, cultural competency, the ability to produce dynamic equivalence between two languages, etc., that an interpreter should have to be able to perform well in typical, general work settings. For example, a question such as “What does the acronym ‘CASLI’ stand for?” would not be on the exam since knowing (or not knowing) this answer would have no bearing on an interpreter’s ability to actually interpret or perform competently on the job. A question such as “When interpreting in a small group meeting with four non-signing hearing individuals and one Deaf consumer sitting at a round table, where should the interpreter position themselves?” would be on the exam since knowing this information and having the ability to apply it would demonstrate an interpreter’s competence on the job.

The exams are designed to assess whether a candidate demonstrates that they are able to meet the needs of the consumers and the community they serve by synthesizing their education, attitude, training, and experience and applying best practices to both every interpreting situation encountered and to the profession, as a whole.

### CASLI Generalist Exam Content Outline

There are three exams used to assess a candidate's eligibility for national certification (CDI or NIC) awarded by the Registry of Interpreters for the Deaf:

**CASLI Generalist Knowledge Exam:**

1. **The Fundamentals of Interpreting Exam** is a bilingual exam presented in American Sign Language and written English, which assesses a candidate's ability to apply practical knowledge of what an interpreter should know to competently perform as an ASL interpreter in typical interpreting settings,
2. **The Ethics and Cultural Responsiveness Exam** is a bilingual exam presented in both American Sign Language and written English, which assesses a candidate's ability to make ethical decisions, demonstrate cultural competency, and demonstrate the skills and abilities needed to competently perform as an ASL interpreter in typical interpreting settings

**CASLI Generalist Performance Exam:**

3. **The Performance Exam** assesses the candidate's ability to perform the tasks required of an ASL interpreter. There are two performance exams: one is specific to the tasks of a Deaf interpreter, the other is specific to the tasks of an interpreter who is not deaf and works primarily between ASL and spoken English.

Each exam is administered and scored separately.

These exams were created from two national ASL Interpreter Job Task Analyses (JTA) Studies: [The RID NIC Job Task Analysis](#) conducted by the Registry of Interpreters for the Deaf, Inc, in 2015, and the [Deaf Interpreter Job Task Analysis](#) conducted by CASLI in 2018 (both available on the CASLI website). These JTAs became the blueprint, or foundation, from which CASLI knowledge exams and performance exams were created.

These three exams assume that the candidate will be able to:

- Accurately transfer messages from a source language to a target language<sup>1</sup> in any engagement that involves vocabulary and subject matter that would normally be understood by ordinary consumers<sup>2</sup>.
- Mediate the cultural differences between the participants in the encounter (the interpreted situation) and they accept responsibility for the integrity of the interpreted message.
- Work at a technical level of discourse<sup>3</sup> and are able to assess their own ability to perform an interpretation which may require specialized knowledge or vocabulary.
- Have advanced competence in ASL and English and are able to accurately facilitate communication between both languages – consecutively or simultaneously – as is appropriate for the situation.
- Readily access and produce the visual and/or auditory cues and nuances of each language with few errors that interfere with, or distract from, the communication.
- Perform these tasks with little or no supervision.
- Work in accordance with established professional conduct standards, alone or in teams of other interpreters, as is appropriate for the situation.
- Accurately relay messages between two languages: Along the continuum of ASL and other signed languages, as well as, other forms of visual and tactile communication for Deaf and DeafBlind individuals and English.
- Make cross-cultural comparisons and assessments, and adjust their communication as needed for the culture.
- Have a mastery of ASL and English to be able to assess the language needs of all parties in a communication.

- (For Deaf Interpreter candidates) Perform interpreting services alone or in a team with other Deaf or hearing interpreters in a variety of settings that involve vocabulary and subject matter that would normally not require a technical understanding of the subject. They are, however, able to determine their own ability to perform an interpretation which may require specialized knowledge or vocabulary.

<sup>1</sup> “Source and target languages” include ASL, spoken English, “English-like signing” or transliteration and sight translation.

<sup>2</sup> “Ordinary consumers” refers to individuals who are not experts in the subject area.

<sup>3</sup> A “technical level of discourse” means discussions involving terms and phrases that have unique meanings in a situation or profession which are different from those used in everyday conversation.

**CASLI GENERALIST KNOWLEDGE EXAMS:** The knowledge portion of the test has two (2) parts, the Fundamentals of Interpreting and the Ethical Decision Making and Cultural Responsiveness Exam. These are described more in-depth below, however, the examples listed are not all inclusive, and CASLI expects that the candidate has done their own due diligence regarding content and context.

**Fundamentals of Interpreting:** The exam is a computer-based exam and has 120 multiple choice questions, half of which are in ASL, half of which are in written English. The items listed below each domain are meant to give examples and are not all-inclusive. The exam covers four (4) major domains:

<b>I. Pre-commitment activities</b> ( <i>i.e., those activities that occur before the interpreter accepts or declines an engagement</i> )	
<i>Tasks:</i>	Gather information about the encounter (including logistics, scope of work and intent of the assignment) and determine the purpose and intended outcomes of the encounter.
	Determine the interpreting needs of all participants in the encounter (including the nature of the assignment, and knowledge of subject matter and communication styles).
	Determine the paralinguistic and environmental aspects of the encounter (such as identifying the preferred communication modalities, and knowing the physical requirements of the assignment); also determine the inter- and intrapersonal skill levels required, such as assessing potential conflicts of interest, or physical, mental or emotional limitations of the consumers, or determining one’s own personal limitations/biases, etc.).
	Determine the need for additional interpreters including Certified Deaf Interpreters (CDIs)(for example, knowing when a situation may require multiple interpreters, or multiple teams).
<b>II. Pre-encounter activities</b> ( <i>i.e., those activities that occur before interpreting begins</i> )	
<i>Tasks:</i>	Conduct research/reading into subject matter of the engagement (such as looking up information about the situation, assessing and mitigating the environmental aspects of the encounter, finding visual aids and other resources to support the interpretation, etc.).
	Collaborate with other interpreters (including Deaf, hearing, and foreign language interpreters) such as determining interpreting protocols for different types of interpreters, logistics and strategies for teaming, etc.
<b>III. The Encounter</b> ( <i>i.e., those activities that occur during the interpreted event</i> )	
<i>Tasks:</i>	Facilitate the encounter (do the interpreting work). This would require knowledge of best practices concerning the most appropriate interpreting approach, of language registers, of elicitation techniques, etc., and ability to understand the intended outcome of the meeting, and to use appropriate controls.
<b>IV. Post-encounter</b> ( <i>i.e., those activities that occur after the interpreter leaves the location of the interpreted event</i> )	
<i>Tasks:</i>	Includes items such as seeking feedback about the encounter from participants, colleagues, mentors, etc. (debriefing, follow up calls, surveys, etc.). It may also mean

	providing feedback to supervisor, referral agency, etc. about the needs of the participants (for future engagements)
	Complete business aspects of interpreting (invoicing, record keeping, etc.), including understanding requirements regarding document retention or destruction, knowledge of safety protocols (such as OSHA, Child Protective Services, etc.) and self-awareness strategies for dealing with vicarious trauma and burnout.

**Ethics and Cultural Responsiveness:** There are eight (8) case studies presented. The candidate will be presented with a scenario, and then be asked to select as many actions or responses among a list of options, as are needed to appropriately respond to the situation as presented. Candidates are to only select actions that are necessary; do not select actions that are not needed, not yet needed, or not appropriate at that point in the case. Each case study is multi-step, and once the candidates select their responses and move to the next step in the scenario, they will not be able to navigate back and change their responses.

**The scenarios** in each case study present an evolving situation. The scenarios assess the candidate's knowledge of cross-cultural communication, awareness of cultural and systemic oppression, and/or ability to assess one's own personal cultural competence for the assignment.

**The options** presented for each step of a scenario may assess the candidate's knowledge of what constitutes a conflict of interest (or the appearance of a conflict of interest); knowledge of power dynamics in different settings; awareness of intentional and/or unintentional compromises of ethical standards (such as on social media); and/or the candidate's ability to apply ethical standards to a given situation, etc. A candidate should be able to:

- Determine if the event fits the interpreter's skill set
- Verify that no conflict of interest exists
- Assess personal cultural competence for engagement
- Assess the skills/needs/preferences of Deaf and hearing participants
- Take steps to ensure confidentiality when appropriate
- Maintain boundaries (i.e. in accordance with professional conduct standards)

**CASLI GENERALIST PERFORMANCE EXAMS:** There are two CASLI Generalist Performance Exams. One assesses the tasks performed by a Deaf interpreter and the other assesses the tasks performed by a hearing interpreter. The CASLI Generalist Performance Exams are computer-based exams consisting of 6 video scenarios. The scenarios range from 5 to 20 minutes. Candidates are to interpret as appropriate using consecutive interpreting, simultaneous interpreting, sight translations or any combination thereof, within each scenario.

Each scenario is of a general community setting and assesses candidates' skills and abilities to:

- Simultaneously produce target language and receive source language applying consecutive/simultaneous/sight or blended interpreting using ASL and English while maintaining message equivalency.
- Adapt and adjust syntactic form (such as temporal sequencing, spatial representation, temporal referencing, pronominal referencing, constructed action, restructuring of question forms to narrow possible responses, adjusting register).
- Interpret fluently at various registers, correct errors when needed as unobtrusively as possible while maintaining transparency in the interpreting process.
- Adapt the interpretation (register, genre, and variations of ASL) to the consumer (including considerations of age, gender, culture, health, and education level).
- Monitor for message accuracy through any method.
- (Deaf) Provide contextual information, incorporate visual descriptions, filtering out irrelevant environmental information while monitoring multiple sources of visual processes for accuracy.
- (Hearing) Produce an interpretation that captures prosodic information (e.g., in English: rhythm, volume, pitch, pausing, etc.; and in ASL: rhythm, velocity, size, pausing, etc.), understand and match intent, and incorporate non-verbal cues.

## Preparing for the CASLI Generalist Exams

**Recommended Reading:** The following is a list of recommended reading that may be helpful in preparing for the CASLI Generalist Exams for both Deaf and hearing exam candidates. This list contains general recommendations from the Test Development Committee, but is by no means comprehensive. This list contains general recommendations for anyone working in or preparing for work within the ASL-English Interpreter profession. CASLI does not intend the list to imply endorsement of these specific references, nor are test items necessarily taken directly from these sources.

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Gannon, J. R. (2012). *Deaf heritage: a narrative history of deaf America*. Washington, DC: Gallaudet University Press.

Granda, A.J. & Nuccio, J., (2018). *Protactile principles, Tactile Communications*, Retrieved September 18, 2018 from <https://www.tactilecommunications.org/Documents/PTPrinciplesMoviesFinal.pdf>.

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Holcomb, T. K., & Smith, D. H. (2018). *Deaf eyes on interpreting*. Washington DC: Gallaudet University Press.

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Lane, H. (1992). *The mask of benevolence: Disabling the deaf community*. San Diego, CA: DawnSignPress.

Larson, M. (1998). *Meaning-based translation: A guide to cross-language equivalence*. New York, NY: University Press of America.

McKee, R. L., & Davis, J. E. (2010). *Interpreting in multilingual, multicultural contexts*. Washington DC: Gallaudet University Press.

Mindness, A. (2014). *Reading between the signs: Intercultural communication for sign language interpreters, 3rd ed.* Boston, MA: Intercultural Press.

National Consortium of Interpreter Education Centers. (2016). *Deaf interpreter curriculum*. Retrieved from <http://www.diinstitute.org/learning-center/deaf-interpreter-curriculum/>

Nicodemus, B. (2009). *Prosodic markers and utterance boundaries in American sign language interpretation*. Washington, DC: Gallaudet University Press.

[RID-NAD Code of Professional Conduct](#)

Roberson, L., & Shaw, S. (Eds.). (2002). *Signed language interpreting in the 21st century: An overview of the profession*. Washington, DC: Gallaudet University Press.

Seal, B. (2004). *Best practices in educational interpreting* (2nd ed.) Boston, MA: Pearson.

[Streetleverage.com](http://Streetleverage.com)

Thumann, M. (2014). *Proficiency and depiction in ASL*. In 2014 Our Roots: The Essence of Our Future: Conference of Interpreter Trainers (pp. 175–185). Retrieved from <http://www.cit-asl.org/new/wp-content/uploads/2014/12/25-2014-thumann.pdf>



**CASLI Generalist Exams Study Checklist:** This is a *suggested* checklist for our candidates and is by no means exhaustive. This checklist assumes that a candidate has participated in interpreter education and/or interpreter training and is able to competently perform the tasks listed on page two of this document.

### **Registering for the Exam:**

- Read the CASLI Exam Candidate Handbook
- Submit any necessary documents to RID or CASLI to meet exam eligibility
- Create an account in RID Member Portal for a RID Member ID number
- Create an account in the CASLI Exam System (CES) for an Exam Candidate Account
- Request an exam in CES. Once eligibility for CASLI Generalist Exam is verified, CASLI staff will manually add an exam for candidates to purchase
  - Send in any requests for ADA/exam accommodations 30 days or more prior to scheduling the exam

### **Preparing for the Exam:**

- Review CASLI Exam Content Outline for an overview of the exams
- Review [NIC](#) and [Deaf Interpreter](#) Job Task Analyses (JTAs) for a more comprehensive listing of knowledge, skills, and abilities (KSAs) needed for competent interpreting practice
- Perform self-assessments on the areas within the KSAs to focus on developing/enhancing interpreting knowledge and competency
- Work with an accomplished language mentor or interpreting mentor to improve language fluency and interpreting competency
- Read and review the resources listed above in “Recommended Reading” on pages 5-6 of this document
- Read and review any resources, literature, or videos not listed above but are generally recognized within the field of ASL Interpreting to be invaluable to one's own professional development (e.g. [RID's Views magazines](#), [CATIE Center's Youtube channel](#), [CALI's self-paced modules](#), etc.)
- Develop/enhance ASL interpreting competence through [deliberate practice](#)
- In the [CASLI Exam System](#), use the “Take a Sample Exam” to familiarize yourself with the user interface, exam instructions, navigation features, and layout of the exam items.

### **Taking the Exam:**

- Practice self-care (e.g. sleep, hygiene, healthful eating, etc.) to improve cognitive abilities, mental health, and physical stamina
- Research and apply self-help techniques (e.g. deep breathing, meditation, etc.) to reduce exam anxiety
- Prepare for your exam appointment by:
  - confirming your appointment day/time/location with your test administrator/test



site (be sure to review and follow any test site rules or policies)

making sure you have all necessary documents (e.g. government issued photo ID, test/proctor token)

planning your clothing/attire for fluctuating temperatures and, if applicable, those that are optimal for on-screen video recording (e.g. works with your skin tone)

planning your route to the test site and, if applicable, parking situation

planning to arrive 15 minutes early to check in, get settled, use the restroom, etc.

cultivating a positive mental attitude (We're rooting for you!)

**All the BEST on your Exam!!!**

**The CASLI Team**

Oregon Health Authority  
Health Licensing Office  
Attn: Samie Patnode  
1430 Tandem Avenue NE, Suite 180  
Salem, Oregon 97301-2192

April 23, 2024

Dear Samie,

Thank you for reading the numerous public comments you are receiving from stakeholders in the newly passed licensure process for American Sign Language interpreters in Oregon. I appreciate the time and willingness with which you, the RAC and the Board have approached listening to all sides in terms of feedback, goals for this process, and trying to address areas of improvement. I am here to add my voice to the mix.

My name is Tamera Richards. I have been a sign language interpreter in the state of Oregon since 1989. I graduated from the Portland Community College Interpreter Training Program (ITP) back in 1992, and I was first certified by the National Association of the Deaf at a Level IV in 1993. In 1994 and 1995 I received my Certificate of Interpretation (CI) and Certificate of Transliteration (CT) from the Registry of Interpreters for the Deaf (RID), and finally attained my Specialist Certificate: Legal (SC:L) from RID in 2003. Throughout that entire duration my certification, liability insurance and certificate maintenance (CEUs) have never lapsed. While my primary practice these days is in the legal arena, I work in a variety of settings as a freelance interpreter.

Before I begin, I want to clearly state my SUPPORT for licensure of ASL interpreters in the state of Oregon. Not only do I think this is a critical safeguard against malpractice and harm within the Deaf, DeafBlind, and hard-of-hearing communities, but I believe that having a centralized location for consumers of ASL interpreting services to voice concerns and complaints that is separate from our certifying body is critical to the autonomy and promotion of agency within the Deaf Community.

Here are a few points I would like to see addressed in terms of the proposed rules as set out but the RAC, currently:

1. **The timeline** for permanency of these rules (the date that they are to take effect) June 8, 2024, is NOTICEABLY short. To meet the requirements stated in the current rules, there will need to be a time extension, so interpreters are able to meet all evaluation criteria.
2. Because this timeline is so tight, the state of Oregon runs the risk of not having qualified interpreters to provide services in critical settings (specifically, medical settings). There has been a national interpreter shortage since interpreting became a profession back in the early 1960s, and it persists today. Due to the additional requirements of ASL interpreters having to complete the OHCI program for OHA, there is already a HUGE need for additional medical interpreters and the requirement for the SLPI (or NSLA) will

potentially strain this resource even further, or potentially cause interpreters to decide not to continue in this area of service.

3. **It is critically important that OHA and HLO understand the difference between an assessment that is designed to evaluate INTERPRETING skills and an assessment that is designed to evaluate CONVERSATIONAL FLUENCY.** The certification evaluations that are provided by the Registry of Interpreters for the Deaf (RID) and (formerly) the National Association of the Deaf (NAD), the Board of Evaluators of Interpreters (BEI – in Texas), and Boystown, USA (who administers the EIPA – Educational Interpreter Performance Assessment) are ALL exams that evaluate INTERPRETING SKILLS.

The ASLPI (American Sign Language Performance Interview) and SLPI (Sign Language Proficiency Interview) are NOT certification exams and DO NOT evaluate a person's competence in providing ASL interpreting services. These evaluations are done to assess a person's conversational skills and fluency in American Sign Language.

Not everyone (in fact, not most people) who have a conversational fluency level in ASL can interpret between ASL and English, and, unfortunately, though conversational fluency would be a pre-requisite to be able to interpret, not all certified interpreters have exceptionally good conversational fluency.

It is because of the experiences of the Deaf Community, and their frustration in being unable to communicate effectively with many certified ASL interpreters, that they have advocated for adding some form of SLPI as a requirement for medical interpreters (I believe this was done in the medical setting because there is also a requirement for medical foreign language interpreters to demonstrate language fluency as well as interpreting skills, so why not do so for ASL interpreters as well).

There is a lot of discussion about why, if medical interpreters are required to take an SLPI, are generalist and supervisory interpreters not ALSO required to take one? I would ask the same question. Theoretically, if we are seasoned and certified interpreters, there should be no problem with being able to pass an SLPI and ensuring a feeling of confidence in interpreter skill within the Deaf Community we serve. So, this is one point to consider.

4. **Fees and Costs** – I have attached a spreadsheet that was recently compiled in 2023-4 of all the states in the U.S. who currently have licensure. Oregon is BY FAR the most expensive license in the country, and this will cause a SERIOUS hardship on many interpreters, and harm the Deaf Community (especially those in rural areas, and those who use interpreters in educational settings) by pricing practitioners out of the profession. Not only does the renewal period need to be reduced (make a license renewal every 2-3 years instead of annually), but it needs to be SUBSTANTIALLY less, especially in the case of interpreters who carry more than one license.

5. **Capacity to meet demand** – As stated before, interpreters are not a commodity. It takes years of training and practice to become an effective, competent interpreter linguistically, and then to become proficient in mediating between Deaf and hearing cultures. Unfortunately, the drive to “churn out” interpreters as fast as possible (especially with the advent of video relay services and massive call centers pulling interpreters out of the community), there has been a decline in the quality of interpreters coming out of programs. The level of burnout in the field is at an all-time high, and it is so important not to add additional barriers to entering or remaining in the field when we are already at such a critical shortage.
- If additional assessments are going to be required, there needs to be assurance from OHA/HLO that interpreters will be ABLE to acquire those assessments and evaluation results in a timely fashion without being penalized for delays by OHA/HLO because of a lack of such capacity to provide timely results from said evaluations.
6. **Concerns about funding for administration of the Sign Language Interpreter Licensing program** – I have heard discussions about WHY OHA/HLO has set the interpreting fees at the exorbitant rates they are right now. There was a projection of issuing about 400 licenses to ASL interpreters when this law became effective. Currently, there are over nine hundred licenses that have been issued (with some interpreters holding more than one license), but these interpreters are not the only ones whose license fees will be supporting the program. According to the law, ANY interpreter providing services to an Oregonian will have to be licensed. This means ALL the video relay services that provide video remote interpreting services (VRI) in the country will have to pay license fees for all their employees to provide remote interpretation to Oregonians (this means Sorenson Video Relay Service, Z/Purple Communications, Convo, etc. will have to license ALL their employees who provide VRI services). This is a revenue stream of THOUSANDS of interpreters nationwide. Therefore, the cost for licensure can be drastically reduced per interpreter, and the program will still be self-supporting.
7. **Impact on Certified Deaf Interpreters and Qualified Deaf Interpreters:** The Deaf Community is already marginalized in all areas of employment. The use of Deaf interpreters within the realm of scenarios that require communication access is vast and needed. There are currently only three Certified Deaf Interpreters (CDIs) in the state of Oregon, and more are desperately needed. It is critical that fees for licensure in Oregon are set at a rate that encourages Deaf individuals to pursue certification and entrance into the field. Setting fees that are remarkably high will not allow for the development of these important colleagues and professionals.
- I want to thank the RAC and the Board for thoughtfully considering all the points interpreters and Community Members have raised throughout this process. I applaud the Deaf Community’s insistence of fluency and competence in the interpreters who serve them, and I thank the lawmakers who have seen fit to do their best to prevent bad actors in our profession from harming those we serve.
8. **Considerations of the advent of AI in ASL Interpretation:** One thing that should be considered is the advent of AI and deep-fake technology and its influence on the future of interpreting. It is impossible to “license” or evaluate an AI bot interpreter, so there should be some sort of safeguard against entities deciding to use some sort of AI app or platform to satisfy access requirements

Finally, I want to give a small budgetary example of an interpreter's expenses to give you an idea of the kinds of overhead and fees we already pay (this may help the RAC when determining appropriate licensure fees):

**Fully certified, legal interpreter with 35 years in the field (me):**

Registry of Interpreters for the Deaf (RID) annual fee: \$220.00

National Association of the Deaf (NAD) Certificate Maintenance annual fee: \$40.00

Professional Liability Insurance (annual): \$152.00

Every three years – 80 hours of continuing education (including additional legal CEUs)

\*My three-year cycle is about to end in 2024 – total cost for these CEUs over 3 years = \$3000.00

Oregon RID Membership annual fee: \$45.00

Oregon Judicial Department CEUs (5 hours every 2 years) - \$150.00

Oregon Judicial Department Court-Certified Interpreting Credential Renewal (every 2 years): \$150.00

**Total cost in fees, certificate maintenance and insurance = \$1607.00 per year**

Proposed added fees by OHA/HLO - \$200.00 annual fee for supervisory license

\$75.00 annual fee for legal license

As a freelance interpreter I am able to set my own rates and negotiate my own contracts (for the most part), and this allows me to cover the overhead it takes to run my own business, but for rural, educational interpreters who are paid much less than they are worth, and have zero control over their income, the licensure fees will price desperately needed educational interpreters out of the field.

OHA/HLO needs to seriously consider these issues when establishing licensure fees and evaluation requirements for awarding licensure.

Thank you again, for the chance to provide my feedback.

Warmly,



Tamera J. Richards, BS, CI & CT ; SC :L, NAD IV : Advanced  
(She/her)

Certified Sign Language Interpreter

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# Licensing / Registration Fees

	A	B	C	D	E	F	G	H	I	J	K	L
	STATE	CREDENTIAL REQUIRED	SEPARATE APPLICATION FEE	INITIAL FEE (FIRST YEAR)	DURATION	RENEWAL FEE	SPECIALITY FEE: MEDICAL	WEBSITE	ADDITIONAL INFORMATION			
1												
2	ALABAMA	License	No	\$225.00	1-Year	\$175.00	None	<a href="https://albit-search.kalmservices.net/">https://albit-search.kalmservices.net/</a>				
3	ALASKA	NONE										
4	ARIZONA	License	No	\$125.00	1-year	\$50.00	None	<a href="https://www.acdhh.org/media/2987/list-of-terps-may-20-2022.pdf">https://www.acdhh.org/media/2987/list-of-terps-may-20-2022.pdf</a>				
5	ARKANSAS	License **See note	No	<u>\$90.00</u>	1-year	\$75.00	None	<a href="https://www.healthy.arkansas.gov/images/uploads/pdf/Active_Interpreters.pdf">https://www.healthy.arkansas.gov/images/uploads/pdf/Active Interpreters.pdf</a>	**During 2024 Arkansas is working on reducing liscensure fees FROM \$90.00 Initial fee, \$75.00 Renewal fee to something more affordable for interpreters. They instituted a 1-year reduction in fees. A note on their website states "Reduced application fees for 2024 license year"			
6	CALIFORNIA	NONE										
7	COLORADO	Certification Recognized							No fees applied for certification recognition.			
8	CONNECTICUT	Registry	No Fees		Ongoing		None	<a href="https://www.portal.ct.gov/aginganddisability/content/pages/programs/deaf-and-hard-of-hearing-interpreter-registry">https://www.portal.ct.gov/aginganddisability/content/pages/programs/deaf-and-hard-of-hearing-interpreter-registry</a>				
9	DELAWARE	*NONE						<a href="https://legis.delaware.gov/BillDetail/89292">https://legis.delaware.gov/BillDetail/89292</a>	*Registration Act in Progress			
10	FLORIDA	NONE										
11	GEORGIA	NONE										
12	HAWAII	NONE						<a href="https://health.hawaii.gov/dcab/files/2022/02/February2022Update.pdf">https://health.hawaii.gov/dcab/files/2022/02/February2022Update.pdf</a>				
13	IDAHO	License	\$25.00	\$70.00	1-year	None	None	<a href="https://apps.dopl.idaho.gov/DOPLPublic/LPRBrowser.aspx">https://apps.dopl.idaho.gov/DOPLPublic/LPRBrowser.aspx</a>				
14	ILLINOIS	License	\$50.00	\$175.00	1-year	\$150.00	None	<a href="https://www2.illinois.gov/idhhc/licensure/Pages/DirectoryHome.aspx">https://www2.illinois.gov/idhhc/licensure/Pages/DirectoryHome.aspx</a>				
15	INDIANA	NONE										

	A	B	C	D	E	F	H	K	L
16	IOWA	License	No	\$120.00	1-year	unknown	None	<a href="https://amanda-portal.idph.state.ia.us/ibpl/portal/#/license/license-query">https://amanda-portal.idph.state.ia.us/ibpl/portal/#/license/license-query</a>	
17	KANSAS	Registration			None	None	None	<a href="https://kcdhh.ks.gov/communication-services/interpreting-services">https://kcdhh.ks.gov/communication-services/interpreting-services</a>	
18	KENTUCKY	License	No	\$175.00	1-year	\$125.00	None	<a href="https://oop.ky.gov/active_lic_dir.aspx">https://oop.ky.gov/active_lic_dir.aspx</a>	
19	LOUISIANA	NONE							
20	MAINE	License	No	\$200.00	1-year	\$200.00	NONE	<a href="https://licensing.web.maine.gov">https://licensing.web.maine.gov</a>	Fees fluctuate. Must complete application to learn fees. Deaf interpreters initial fee \$100.00
21	MARYLAND	NONE							Licensure is in planning stages. Current plan is to institute licensure in 2025
22	MASSACHUTTES	NONE							
23	MICHIGAN	Certification Verification	No	\$30.00	1-year	\$30.00	None	<a href="https://interpreter.apps.lara.state.mi.us/">https://interpreter.apps.lara.state.mi.us/</a>	
24	MINNESOTA	NONE							
25	MISSISSIPPI	Registration	No	\$25.00	2-year	\$25.00	None	<a href="https://www.odhh.org/interpreter-registration/interpreters/">https://www.odhh.org/interpreter-registration/interpreters/</a>	
26	MISSOURI	License	No	\$60.00	1-year	\$60.00	None	<a href="https://pr.mo.gov/interpreters.asp">https://pr.mo.gov/interpreters.asp</a>	
27	MONTANA	NONE							
28	NEBRASKA	License	No	\$150.00	2-years	\$150.00	None	<a href="https://ncdhh.nebraska.gov/sites/ncdhh.nebraska.gov/files/doc/Licensed%20Interpreter%20Roster%204.11.2022.pdf">https://ncdhh.nebraska.gov/sites/ncdhh.nebraska.gov/files/doc/Licensed%20Interpreter%20Roster%204.11.2022.pdf</a>	
29	NEVADA	Registration	No		1-year	None	None	<a href="https://nvir.certemy.com/public-registry/1bd856a7-477b-4d87-89d5-a1f8d84703cf">https://nvir.certemy.com/public-registry/1bd856a7-477b-4d87-89d5-a1f8d84703cf</a>	Proof of certification required for registration with the state. No fees for registration.
30	NEW HAMPSHIRE	License	\$50.00	\$150.00	3-years	\$175.00	None	<a href="https://www.education.nh.gov">https://www.education.nh.gov</a>	
31	NEW JERSEY	NONE							
32	NEW MEXICO	License	No	\$65.00	2-years	\$50.00	None	<a href="http://verification.rld.state.nm.us/Search.aspx?facility=N">http://verification.rld.state.nm.us/Search.aspx?facility=N</a>	
33	NEW YORK	NONE							
34	NORTH CAROLINA	License	\$38.00	\$225.00	1-year	\$150.00	None	<a href="https://ncitlb.org/current-licensees/">https://ncitlb.org/current-licensees/</a>	Established 12/01/2005
35	NORTH DAKOTA	Proof of Certification							No fees attached to proof of certification requirement.
36	OHIO	NONE							

#### OREGON INTERPRETER LICENSING FEES

LICENSE TYPE	ONE-TIME APPLICATION FEE	LICENSE FEE (INITIAL AND RENEWAL)
Supervisory (3+ years experience)	\$150.00	\$200.00
Generalist (Less than 3-years experience)	\$100.00	\$150.00
Provisional	\$75.00	\$100.00
Medical	\$50.00	\$50.00
Legal	\$50.00	\$50.00
Educational	\$75.00	\$100.00

Some statistical facts:

Oregon is **THE ONLY STATE** to require additional fees for Medical interpreters.

**Of the 50 states plus DC only 23 have fees. 28 States have NO FEES.**

**Fewer than 50% of states have licensing fees.**

Of the 23 states that have license fees **ONLY FIVE** are **\$200.00 dollars or more.**

**\$120.00 is the median fee for first year license fee.**

Oregon's licensing cost is \$137.00 more than the next closest state. (for Supervisory PLUS Medical)

**Oregon's cost is \$375.00 more than the state with the lowest fees.**

#### Additional Requirements BEFORE Licensure as a Medical Interpreter can be obtained:

Oregon requires interpreters to obtain additional qualifications to work as a Medical interpreter:

1. Hold Interpreter Certification from RID or other approved body, for example the NIC test administered by CASLI

**\$280.00 Written test CASLI**

**\$395.00 Performance Exam CASLI**

**\$198.00 RID Renewal Fee for certified interpreters (this is annual certified rate plus two member sections)**

**\$740.00 approximate cost per year for 20 CEUs, (80 hours per 4-year CEU cycle), \$25-50 average cost per unit hour (CEUs=Continuing Education Units)**

2. Obtain Level 4 score on annual(?) Language Proficiency Interview

**\$185.00 (without diagnostic feedback)**

**\$220.00 (with diagnostic feedback)**

3. Medical Interpreters must obtain Oregon Certified Healthcare Interpreter (OCHI) qualification

Obtaining OCHI requires proof of 80-hours of medical interpreting. And 60-hour course in medical interpreting course provided by Oregon Health Authority.

**Cost of 60-hour training: \$585.00**

**Renewal every 4-years (Cost unknown), Obtain 24- hours CEUs in healthcare interpreting.**

4. Medical Interpreters must also obtain CoreCHI™ (CORE Certified Healthcare Interpreter, a National certification)

**\$175.00 CoreCHI™ written exam**

**\$300.00 EtoE Performance exam (cost may be incorrect)**

Renewal 4-years, 32 hours CEUs.

#### COSTS To be Licensed (FIRST YEAR):

1. \$675.00 Total cost for NIC exam by CASLI

2. \$185.00 Language proficiency Interview

3. \$585.00 60-hour training/test for OCHI qualification

4. \$175.00 CoreCHI™ certification

5. \$400.00 To obtain the Supervisor License (3+ years of Interpreting Experience) PLUS Medical license

**\$2,020.00 TOTAL minimum to START as a medical interpreter in Oregon**

**It is imperative Oregon re-evaluate and LOWER their fee structure to ensure that interpreters can afford to obtain and maintain licensure in Oregon.**

These costs add up to an exorbitant amount for interpreter's. Interpreter take home pay is much less than people assume.

One good breakdown divides a freelance interpreter's income into thirds (1/3 taxes, 1/3 expenses, 1/3 take home income.)

**If a freelance interpreter earns GROSS \$90K per year, after taxes and expenses, they are only bringing home NET \$30K**



**From:** [V. Darden](#)  
**To:** [Patnode Samie](#); [Edwards Carrie](#)  
**Subject:** Comments on SLI Licensure  
**Date:** Sunday, April 28, 2024 12:00:11 PM

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Some people who received this message don't often get email from vickidarden@gmail.com. [Learn why this is important](#)

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To the Health Licensing Office

Below are my comments on various aspects of the implementation of rules for licensing sign language interpreters in the state of Oregon.

- Generally, I am concerned that the Deaf community will be greatly negatively impacted by the drastic reduction of currently working interpreters if licensure is implemented in June, 2024. There are a significant number of practicing interpreters who have not accomplished the criteria for licensure, and have no way of doing so by the deadline set by the committee. Some of these interpreters are not qualified to be doing the work, but have been able to find employment because of the chronic shortage of qualified interpreters. It is reasonable that those interpreters be removed from practice until they are qualified. However, there are others who are competent and will also not be able to continue to work, including some formerly RID certified interpreters whose certifications have lapsed for various reasons.
  - The RID certification system has been in chaos for some time, including instituting a moratorium in 2015, several test revisions of the NIC since its inception, and the development of a new entity to develop and oversee a new test and the need to withhold results for over a year for psychometric purposes. The wait time for results has been excessively long for decades. This does not appear to have been resolved.
  - Anecdotal information shared with me by newer practitioners indicates that the wait time to schedule performance exams for the NIC and BEI, and the assessment for EIPA is at least six months.
  - The various ASL assessments that have been proposed as vehicles to assess competence (ASLPI, etc.) are not adequate. They do not assess interpreting ability, and only provide limited feedback on one dialect of one of the languages required for ASL/English interpreters. It is not evident to me that those administering the assessments have adequate background, education to evaluate what they claim to evaluate, nor is it clear to me that the assessments are psychometrically sound nor have established inter-rater reliability.
- As an interpreter educator, diagnostician, and rater of corporate interpreter hiring assessments, I don't believe that three years of generalist experience qualifies an interpreter to work at the supervisory level. I don't support every interpreter being forced into a supervisory category. Not all of them are qualified, even if they have much more than three years of experience, and not all of them desire to be in that

category. The generalist license should be allowed to be renewed an unlimited number of times.

- The supervisory license is ill-defined. What does "supervision" entail? How is the additional work required by the supervisory license holder funded?
- I have heard first- and second-hand that many newer (and some seasoned) interpreters find the fees onerous enough to discourage them from the field. For a profession that already has a hard time recruiting, developing, and retaining practitioners, this will have a deleterious effect on the Deaf community primarily, as well as add stress to a field that already struggles with burnout and overwork.

These are not my only concerns, but among the most concerning. Thank you for your consideration.

--

Vicki Darden, Ph.D.

ASL/English Interpreting:

RID CI & CT; NAD IV

RID Certification Maintenance Program (CMP) Sponsor

# Draft Rules

# Board of Sign Language Interpreters - May 15, 2024, Meeting Review and Adopt Permanent Rules

New text in **BOLD** and deleted ~~text highlighted in yellow~~ with changes since rules were proposed

ADOPT: 816-005-0000

RULE TITLE: Definitions

RULE SUMMARY: Definitions for sign language interpreters.

RULE TEXT:

The following abbreviations apply to OAR Chapter 816, Divisions 005 to 0085:

- (1) “ASL” means American Sign Language.
- (2) “Board” means the State Board of Sign Language Interpreters.
- (3) “Educational setting” means a public agency or school district as those terms are defined in OAR 581-015-2000.
- (4) “EIPA” means the Educational Interpreting Performance Assessment.
- (5) “HLO” means the Health Licensing Office.
- (6) “NAD” means the National Association of the Deaf.
- (7) “DOE” means Department of Education.
- (8) “RID” means Registry of Interpreters for the Deaf.
- (9) “SLI” means “sign language interpreter” as that term is defined in ORS 676.750.
- (10) “SLI generalist license” means a “sign language interpreter license” corresponding to ORS 676.756.
- (11) **“Supervisor” means advisor, coach, instructor, mentor, or trainer.**
- (12) “TBEI” means Texas Board for Evaluation of Interpreters.

STATUTORY/OTHER AUTHORITY: ORS 676.750, ORS 676.753, ORS 676.756, ORS 676.759, ORS 676.762, ORS 676.765, ORS 676.768, ORS 676.783, ORS 676.786

STATUTES/OTHER IMPLEMENTED: ORS 676.750, ORS 676.753, ORS 676.756, ORS 676.759, ORS 676.762, ORS 676.765, ORS 676.768, ORS

676.783, ORS 676.786

ADOPT: 816-005-0010

RULE TITLE: Election Of Chairperson and Vice Chairperson

RULE SUMMARY: Requirements for electing chairperson and vice-chairperson of the State Board of Sign Language Interpreters.

RULE TEXT:

The chairperson and vice chairperson must be elected annually. Elections must be held during the last Board meeting of the year or if canceled, the next scheduled meeting. Terms of office run from January 1 to December 31.

STATUTORY/OTHER AUTHORITY: ORS 676.780, ORS 676.783

STATUTES/OTHER IMPLEMENTED: ORS 676.780

ADOPT: 816-005-0020

RULE TITLE: Vacancies in Office

RULE SUMMARY: Process for filling chairperson and vice chairperson vacancies when they are unavailable.

RULE TEXT:

If the chairperson or vice chairperson is unable to complete the Officer's respective term, then the Board must elect another chairperson or vice chairperson.

STATUTORY/OTHER AUTHORITY: ORS 676.780, ORS 676.783

STATUTES/OTHER IMPLEMENTED: ORS 676.780

ADOPT: 816-005-0030

RULE TITLE: Duties of Officers and Board Procedures

RULE SUMMARY: Duties of the chairperson and vice chairperson.

RULE TEXT:

(1) Except for the provision listed in subsection (2) of this rule, the chairperson must preside at all meetings. The chairperson shall confer with the Office on matters that come up between meeting dates and matters that need to be placed on the agenda for Board meetings. The chairperson may order or reorder the agenda.

(2) The vice chairperson will preside at the meeting or the portion of the meeting when the chairperson is absent.

(3) Board decisions will be made by a vote of the Board, preceded by a motion and second to the motion.

STATUTORY/OTHER AUTHORITY: ORS 676.780, ORS 676.783

STATUTES/OTHER IMPLEMENTED: ORS 676.780



ADOPT: 816-015-0000

RULE TITLE: Emergency Care and Exceptions

RULE SUMMARY: Exemptions for licensing requirements.

RULE TEXT:

(1) Nothing in these rules is meant to prevent an Emergency Medical Services provider from providing prehospital care as that term is defined in ORS 682.025 to an individual who communicates in signed language.

(2) Nothing in these rules is meant to delay assistance or care in emergency situations involving imminent or immediate harm and during which a licensee is not available.

(3) Nothing in these rules is meant to conflict with or supersede federal law.

(4) Sign language interpretation services may be provided by a person who is a qualified interpreter under ORS 45.288, or a court interpreter certified under ORS 45.291 providing SLI services for the purpose of a proceeding in the Supreme Court, Court of Appeals, Oregon Tax Court, or a circuit court.

STATUTORY/OTHER AUTHORITY: ORS 676.771, ORS 676.783

STATUTES/OTHER IMPLEMENTED: ORS 676.771, ORS 676.783

ADOPT: 816-025-0000

RULE TITLE: SLI Supervisory License

RULE SUMMARY: Description of a SLI supervisory license.

RULE TEXT:

(1) A SLI supervisory license holder:

(a) May provide SLI services.

(b) May supervise SLI provisional license holders.

(c) May provide SLI services in an educational setting.

(d) May not provide SLI services in a medical setting unless the person holds a license under ORS 676.765 and OAR 816-025-0060.

(e) May not provide SLI services in a legal setting unless the person holds a license under ORS 676.768 and OAR 816-025-0080.

(2) A SLI supervisory license is current for one year and becomes inactive on the last day of the month one year from the date of issuance.

(3) A SLI supervisory license may be renewed.

(4) The issuance or the licensee's holding of a SLI supervisory license does not supersede, replace, or negate the need for the licensee to comply with other laws requiring licensure or registration, or competent SLI services.

STATUTORY/OTHER AUTHORITY: ORS 676.753, ORS 676.783

STATUTES/OTHER IMPLEMENTED: ORS 676.750, ORS 676.753, ORS 676.759, ORS 676.762, ORS 676.768, ORS 676.783

ADOPT: 816-025-0010

RULE TITLE: Application Requirements for SLI Supervisory License

RULE SUMMARY: Application requirements for an SLI supervisory license.

RULE TEXT:

An individual applying for a SLI supervisory license must:

- (1) Meet the requirements of OAR 331 division 30.
- (2) Submit a completed application form prescribed by HLO, which must contain the information listed in OAR 331-030-0000 and be accompanied by payment of all required fees pursuant to OAR 816-085-0000.
- (3) Submit proof of being at least 18 years of age; documentation to prove age may include identification listed under OAR 331-030-0000.
- (4) Submit proof of being in compliance with the 2005 NAD-RID Code of Professional Conduct listed under OAR 816-065-0000.
- (5) Submit proof of having at least three years of qualifying experience holding a credential from one of the following for at least three years:
  - (a) RID Certified Deaf Interpreter certification.
  - (b) RID National Interpreting Certification.
  - (c) RID National Interpreting Certification: Advanced.
  - (d) RID National Interpreting Certification: Master.
  - (e) RID Certificate of Interpretation.
  - (f) RID Certificate of Transliteration.
  - (g) RID Comprehensive Skills Certificate.
  - (h) RID Master Comprehensive Skills Certificate.
  - (i) RID Interpretation Certificate.
  - (j) RID Transliteration Certificate.
  - (k) RID Edu K-12 Certification.**
  - (l) RID Reversed Skills Certificate.**

(m) NAD IV Level Certification.

(n) NAD V Level Certification.

**(o) NAD III Level Certification.**

(p) TBEI Advanced Certificate.

(q) TBEI Master Certificate.

(r) TBEI Trilingual Advanced Certificate.

(s) TBEI Trilingual Master Certificate.

(t) TBEI Level IV Certificate.

(u) TBEI Level V Certificate.

(v) TBEI Level III Intermediary Certificate.

(w) TBEI Level IV Intermediary Certificate.

(x) TBEI Level V Intermediary Certificate.

(y) EIPA **Secondary** Level PSE 4.0 or above.

(z) EIPA **Secondary** Level ASL 4.0 or above.

STATUTORY/OTHER AUTHORITY: ORS 676.753, ORS 676.783, ORS 676.786

STATUTES/OTHER IMPLEMENTED: OR 676.750, ORS 676.753, ORS 676.783

ADOPT: 816-025-0020

RULE TITLE: SLI Generalist License

RULE SUMMARY: Description of a SLI generalist license.

RULE TEXT:

(1) A SLI generalist license holder:

(a) May provide SLI services.

(b) May supervise SLI provisional license holders until July 1, 2030.

(c) May provide SLI services in an educational setting.

(d) May not provide SLI services in a medical setting unless the person holds a license under ORS 676.765 and OAR 816-025-0060.

(e) May not provide SLI services in a legal setting unless the person holds a license under ORS 676.768 and OAR 816-025-0080.

(2) A SLI generalist license is current for one year and becomes inactive on the last day of the month one year from the date of issuance.

(3) This SLI generalist license may be renewed twice.

(4) The issuance or the licensee's holding of a SLI generalist license does not supersede, replace, or negate the need for the licensee to comply with other laws requiring licensure or registration, or competent SLI services.

STATUTORY/OTHER AUTHORITY: ORS 676.750, ORS 676.756, ORS 676.783

STATUTES/OTHER IMPLEMENTED: ORS 676.756, ORS 676.759, ORS 676.762, ORS 676.765, ORS 676.768, ORS 676.783

ADOPT: 816-025-0030

RULE TITLE: Application Requirements for SLI Generalist License

RULE SUMMARY: Application requirements for SLI generalist license.

RULE TEXT:

An individual applying for a SLI generalist license must:

- (1) Meet the requirements of OAR 331 division 30.
- (2) Submit a completed application form prescribed by HLO, which must contain the information listed in OAR 331-030-0000 and be accompanied by payment of all required fees pursuant to OAR 816-085-0000.
- (3) Submit proof of being at least 18 years of age; documentation to prove age may include identification listed under OAR 331-030-0000.
- (4) Submit proof of being in compliance with the 2005 NAD-RID Code of Professional Conduct listed under OAR 816-065-0000.
- (5) Submit proof of holding a credential from one of the following:
  - (a) RID Certified Deaf Interpreter certification.
  - (b) RID National Interpreting Certification.
  - (c) RID National Interpreting Certification: Advanced.
  - (d) RID National Interpreting Certification: Master.
  - (e) RID Certificate of Interpretation.
  - (f) RID Certificate of Transliteration.
  - (g) RID Comprehensive Skills Certificate.
  - (h) RID Master Comprehensive Skills Certificate.
  - (i) RID Interpretation Certificate.
  - (j) RID Transliteration Certificate.
  - (k) RID Edu K-12 Certification.**
  - (l) RID Reversed Skills Certificate.**

(m) NAD IV Level Certification.

(n) NAD V Level Certification.

**(o) NAD III Level Certification.**

(p) TBEI Advanced Certificate.

(q) TBEI Master Certificate.

(r) TBEI Trilingual Advanced Certificate.

(s) TBEI Trilingual Master Certificate.

(t) TBEI Level IV Certificate.

(u) TBEI Level V Certificate.

(v) TBEI Level III Intermediary Certificate.

(w) TBEI Level IV Intermediary Certificate.

(x) TBEI Level V Intermediary Certificate.

(y) EIPA **Secondary** Level PSE 4.0 or above.

(z) EIPA **Secondary** Level ASL 4.0 or above.

STATUTORY/OTHER AUTHORITY: ORS 676.756, ORS 676.759, ORS 676.783

STATUTES/OTHER IMPLEMENTED: ORS 676.750, ORS 676.756, ORS 676.783

ADOPT: 816-025-0040

RULE TITLE: SLI Educational License

RULE SUMMARY: Description of a SLI educational license.

RULE TEXT:

- (1) An SLI educational license holder may only provide services in an educational setting.
- (2) A SLI educational license is current for one year and becomes inactive on the last day of the month one year from the date of issuance.
- (3) This SLI educational license may be renewed five times.
- (4) The issuance or the licensee's holding of an SLI educational license does not supersede, replace, or negate the need for the licensee to comply with other laws requiring licensure or registration, or competent SLI services.
- (5) SLI educational interpreters are not required to work under supervision.**

STATUTORY/OTHER AUTHORITY: ORS 676.750, ORS 676.753, ORS 676.762, ORS 676.783, ORS 676.786

STATUTES/OTHER IMPLEMENTED: ORS 676.753, ORS 676.756, ORS 676.762, ORS 676.783, ORS 676.786



ADOPT: 816-025-0050

RULE TITLE: Application Requirements for SLI Educational License

RULE SUMMARY: Application requirements for an SLI educational license.

RULE TEXT:

An individual applying for an SLI educational license must:

- (1) Meet the requirements of OAR 331 division 30.
- (2) Submit a completed application form prescribed by HLO, which must contain the information listed in OAR 331-030-0000 and be accompanied by payment of all required fees pursuant to OAR 816-085-0000.
- (3) Submit proof of being at least 18 years of age; documentation to prove age may include identification listed under OAR 331-030-0000.
- (4) Submit proof of being in compliance with the 2005 NAD-RID Code of Professional Conduct listed under OAR 816-065-0000.
- (5) Submit proof of meeting minimum standard requirements established by the Department of Education in OAR 581-015-2035. If OAR 581-015-2035 establishes an educational sign language interpreter license as the minimum standard, then this requirement is met if HLO finds that the applicant qualifies for licensure under this rule.
- (6) Submit proof of meeting the following minimum standards: ~~Attest to meeting the following minimum standards:~~
  - (a) Achieving a passing score of 3.5 or above on the EIPA Performance Test or holding RID National Interpreting Certification, RID Certificate of Interpretation or RID Certificate of Transliteration; and
  - (b) Holding a bachelor's or associate degree from an Interpreter Education Program or in a related educational field; or achieving a passing score on the EIPA Written test.

STATUTORY/OTHER AUTHORITY: ORS 676.762, ORS 676.783, ORS 676.786

STATUTES/OTHER IMPLEMENTED: ORS 676.750, ORS 676.762, ORS 676.783

ADOPT: 816-025-0060

RULE TITLE: SLI Medical License

RULE SUMMARY: Description of a SLI medical license.

RULE TEXT:

- (1) A SLI medical license holder may provide SLI services in a medical setting.
- (2) Only a person holding a SLI medical license under this rule may provide SLI services in a medical setting.
- (3) A SLI medical license is current for one year and becomes inactive on the last day of the month one year from the date of issuance.
- (4) This SLI medical license may be renewed.
- (5) The issuance or the licensee's holding of a SLI medical license does not supersede, replace, or negate the need for the licensee to comply with other laws requiring licensure or registration, or competent SLI services.

STATUTORY/OTHER AUTHORITY: ORS 676.765, ORS 676.783

STATUTES/OTHER IMPLEMENTED: ORS 676.750, ORS 676.753, ORS 676.756, ORS 676.765, ORS 676.783

ADOPT: 816-025-0070

RULE TITLE: Application Requirements for SLI Medical License

RULE SUMMARY: Application requirements for an SLI medical license.

RULE TEXT:

An individual applying for a SLI medical license must:

- (1) Meet the requirements of OAR 331 division 30.
- (2) Submit a completed application form prescribed by HLO, which must contain the information listed in OAR 331-030-0000 and be accompanied by payment of all required fees.
- (3) Hold an active SLI supervisory license under ORS 676.753 and OAR 816-025-0000 or an active SLI generalist license under ORS 676.756 and OAR 816-025-0020, both with no current disciplinary action.
- (4) Submit proof of holding one of the following credentials:
  - (a) Certification in ASL interpreting from the RID; or
  - (b) American Sign Language Proficiency Interview or the Sign Language Proficiency Interview with a minimum proficiency level of 4 or advanced.

STATUTORY/OTHER AUTHORITY: ORS 676.765, ORS 676.783

STATUTES/OTHER IMPLEMENTED: ORS 676.750, ORS 676.753, ORS 676.756, ORS 676.765, ORS 676.783, ORS 676.786

ADOPT: 816-025-0080

RULE TITLE: SLI Legal License

RULE SUMMARY: Description of a SLI legal license.

RULE TEXT:

- (1) A SLI legal license holder may provide SLI services in a legal setting.
- (2) Only a person holding a SLI legal license under this rule may provide SLI services in a legal setting.
- (3) A SLI legal license is current for one year and becomes inactive on the last day of the month one year from the date of issuance.
- (4) This SLI legal license may be renewed.
- (5) The issuance or the licensee's holding of a SLI legal license does not supersede, replace, or negate the need for the licensee to comply with other laws requiring licensure or registration, or competent SLI services.
- (6) A legal setting does not include proceedings in federal courts.

STATUTORY/OTHER AUTHORITY: ORS 676.768, ORS 676.783

STATUTES/OTHER IMPLEMENTED: ORS 676.750, ORS 676.753, ORS 676.756, ORS 676.768, ORS 676.783

ADOPT: 816-025-0090

RULE TITLE: Application Requirements for SLI Legal License

RULE SUMMARY: Application requirements for an SLI legal license.

RULE TEXT:

An individual applying for a SLI legal license must:

- (1) Meet the requirements of OAR 331 division 30.
- (2) Submit a completed application form prescribed by HLO, which must contain the information listed in OAR 331-030-0000 and be accompanied by payment of all required fees pursuant to OAR 816-085-0000.
- (3) Hold an active SLI supervisory license under ORS 676.753 and OAR 816-025-0000 or a SLI generalist license under ORS 676.756 and OAR 816-025-0020 with no current disciplinary action.
- (4) Attest to having completed 40 hours of education on legal interpreting or attest to holding one of the following credentials:
  - (a) Qualified interpreter under ORS 45.288.
  - (b) Court interpreter certified under ORS 45.291.
  - (c) RID Specialist Certification: Legal.
  - (d) RID Conditional Legal Interpreting Permit-Relay.
  - (e) Board for Evaluation of Interpreters Court Interpreter Certificate.

STATUTORY/OTHER AUTHORITY: ORS 676.768, ORS 676.783

STATUTES/OTHER IMPLEMENTED: ORS 676.750, ORS 676.753, ORS 676.756, ORS 676.768, ORS 676.783

ADOPT: 816-025-0100

RULE TITLE: SLI Provisional License

RULE SUMMARY: Description of a SLI provisional license.

RULE TEXT:

(1) A SLI provisional license holder:

(a) May only provide SLI services under the supervision of a person holding a SLI supervisory license or a SLI generalist license.

(b) May be supervised onsite or remotely.

(c) May have more than one supervisor.

(d) May not supervise any other person providing SLI services.

(e) May not provide SLI services in a medical or legal setting.

(f) May not provide SLI services in an educational setting unless the person holds a license under ORS 676.762 and OAR 816-025-0040.

(2) A SLI provisional license is current for one year and becomes inactive on the last day of the month one year from the date of issuance.

(3) A SLI provisional license may be renewed up to five times.

(4) The issuance or the licensee's holding of a SLI provisional license does not supersede, replace, or negate the need for the licensee to comply with other laws requiring licensure or registration, or competent SLI services.

(5) If an applicant has not received a passing score on one of the EIPA examinations listed in OAR 816-025-0100(5) they must disclose the information to each client.

STATUTORY/OTHER AUTHORITY: ORS 676.759, ORS 676.783

STATUTES/OTHER IMPLEMENTED: ORS 676.750, ORS 676.753, ORS 676.756, ORS 676.759, ORS 676.783

ADOPT: 816-025-0110

RULE TITLE: Application Requirements SLI for Provisional License

RULE SUMMARY: Application requirements for an SLI provisional license.

RULE TEXT:

An individual applying for a SLI provisional license must:

- (1) Meet the requirements of OAR 331 division 30.
- (2) Submit a completed application form prescribed by HLO, which must contain the information listed in OAR 331-030-0000 and be accompanied by payment of all required fees pursuant to OAR 816-085-0000.
- (3) Submit proof of being at least 18 years of age; documentation to prove age may include identification listed under OAR 331-030-0000.
- (4) Submit proof of being in compliance with the 2005 NAD-RID Code of Professional Conduct listed under OAR 816-065-0000.
- (5) Submit proof of holding a credential from one of the following:
  - (a) EIPA **Secondary** PSE 3.5 or above.
  - (b) EIPA **Secondary** ASL 3.5 or above.
  - (c) American Sign Language Performance Interview 4 or above.
  - (d) Sign Language Proficiency Interview score of Advanced or above.
  - (e) TBEI Basic Certificate.
  - (f) TBEI Level III Certificate.
  - (g) TBEI Level II Certificate.
  - (h) NAD Level III Certification.**
  - (i) (h) Center for the Assessment of Sign Language Interpretation Generalist Knowledge Exam.
- (6) Attest that the individual will only provide SLI services under the supervision of a person holding a SLI supervisory license or a SLI generalist license.
- (7) Provide supervisor information including but not limited to name and license number on a form prescribed by the Office.

STATUTORY/OTHER AUTHORITY: ORS 676.759, ORS 676.783  
STATUTES/OTHER IMPLEMENTED: ORS 676.750, ORS 676.753, ORS  
676.756, ORS 676.759, ORS 676.783



ADOPT: 816-025-0150

RULE TITLE: SLI Specialty Training License

RULE SUMMARY: Description of a SLI specialty training license.

RULE TEXT:

(1) A SLI specialty training license holder:

(a) May provide SLI services under the direct on-site supervision of a person holding a SLI supervisory license or a SLI generalist license.

(b) May provide SLI services in an educational setting under the direct on-site supervision of a person holding a SLI supervisory license or a SLI generalist license.

(c) May not provide SLI services in a medical or legal setting.

(2) A SLI specialty training license is current for one year and becomes inactive on the last day of the month one year from the date of issuance.

(3) A SLI specialty training license may be renewed up to five times.

(4) The issuance or the license holder's holding of a training license does not supersede, replace, or negate the need for the license holder to comply with other laws requiring licensure or registration, or competent SLI services.

(5) A SLI specialty training license is for purposes of learning and training and is an authorization under ORS 676.562.

STATUTORY/OTHER AUTHORITY: ORS 676.783

STATUTES/OTHER IMPLEMENTED: ORS 676.750, ORS 676.783

ADOPT: 816-025-0160

RULE TITLE: Application Requirements for SLI Specialty Training License

RULE SUMMARY: Application requirements for an SLI specialty training license.

RULE TEXT:

An individual applying for a SLI specialty training license must:

- (1) Meet the requirements of OAR 331 division 30.
- (2) Submit a completed application form prescribed by HLO, which must contain the information listed in OAR 331-030-0000.
- (3) Submit proof of identity; documentation to prove identity may include identification listed under OAR 331-030-0000.
- (4) Attest that the individual will only provide SLI services under the direct on-site supervision of a person holding a SLI supervisor license or a SLI generalist license.
- (5) Provide supervisor information including but not limited to name and license number on a form prescribed by the Office.

STATUTORY/OTHER AUTHORITY: ORS 676.771, ORS 676.783

STATUTES/OTHER IMPLEMENTED: ORS 676.750, ORS 676.771, ORS 676.783

ADOPT: 816-045-0000

RULE TITLE: License Issuance and Renewal Requirements

RULE SUMMARY: Requirements for license issuance and renewal.

RULE TEXT:

(1) A licensee is subject to the provisions of OAR Chapter 331, Division 30 regarding the renewal of an authorization, and provisions regarding authorization to practice, identification, and requirements for issuance of a duplicate authorization.

(2) Authorizations issued under these rules are valid for one year.

(3) LICENSE RENEWAL: To avoid delinquency fees, license renewal must be made prior to the authorization entering inactive status. To renew, the license holder must submit:

(a) Renewal application form; and

(b) Payment of required renewal fee pursuant to OAR 816-085-0000.

(4) INACTIVE LICENSE RENEWAL: A license may be inactive for up to three years. A licensee who is inactive is not authorized to practice. When renewing after entering inactive status, the licensee must submit the following:

(a) Renewal application form; and

(b) Payment of delinquency and license fees pursuant to OAR 816-085-0000.

(5) EXPIRED LICENSE: A license that has been inactive for more than three years is expired and the licensee must reapply for licensure and meet the requirements for the applicable license:

(a) SLI supervisory license application requirements listed in OAR 816-025-0010.

(b) SLI generalist license application requirements listed in OAR 816-025-0030.

(c) SLI educational license application requirements listed in OAR 816-025-0050.

(d) SLI medical license application requirements under OAR 816-025-0070.

(e) SLI legal license application requirements under OAR 816-025-0090.

(f) SLI provisional license application requirements under OAR 816-025 0110.

(g) SLI specialty training license application requirements under OAR 816-025-0160.

(6) For the purpose of subsection (1) through (5) of this rule “license” refers to all license types SLI supervisory, SLI generalist, SLI educational, SLI medical, SLI legal, SLI provisional, and SLI specialty licenses.

(7) An SLI generalist license may be renewed twice.

(8) An SLI provisional license may be renewed up to five times.

(9) SLI educational license may be renewed up to five times.

STATUTORY/OTHER AUTHORITY: ORS 676.753, ORS 676.756, ORS 676.579, ORS 676.762, ORS 676.768, ORS 676.771, ORS 676.783  
STATUTES/OTHER IMPLEMENTED: ORS 676.750, ORS 676.753, ORS 676.756, ORS 676.579, ORS 676.762, ORS 676.768, ORS 676.783

ADOPT: 816-065-0000

RULE TITLE: Approved Code of Professional Conduct

RULE SUMMARY: Approved code of conduct.

RULE TEXT:

(1) The Board approves the 2005 NAD-RID Code of Professional Conduct as its professional practice standards code.

(2) A person licensed under the SLI rules must be in compliance with the code of professional conduct listed in section (1) of this rule.

(3) The 2005 NAD-RID Code of Professional Conduct is available on the RID website or is available for review at the HLO.

STATUTORY/OTHER AUTHORITY: ORS 676.753, ORS 676.756, ORS 676.759, ORS 676.762, ORS 676.783, ORS 676.786

STATUTES/OTHER IMPLEMENTED: ORS 676.750, ORS 676.753, ORS 676.756, ORS 676.759, ORS 676.762, ORS 676.783

ADOPT: 816-085-0000

RULE TITLE: Fees

RULE SUMMARY: Fees for SLI applicants and licensees.

RULE TEXT:

(1) An applicant or license holder is subject to the provisions of OAR 331-010-0010 and OAR 331-010-0020 regarding the payment of fees, penalties, and charges.

(2) Fees established by the Office pursuant to ORS 676.576 are:

(a) Application fee:

(A) SLI supervisory license: \$150.

(B) SLI generalist license: \$100.

(C) SLI educational license: \$100.

(D) SLI medical license: \$50.

(E) SLI legal license: \$50.

(F) SLI provisional license: \$75.

(G) SLI training license: \$50

(b) Original issuance and renewal fee:

(A) SLI supervisory license: \$200.

(B) SLI generalist license: \$150.

(C) SLI educational license: \$150.

(D) SLI medical license: \$50.

(E) SLI legal license: \$50.

(F) SLI provisional license: \$100.

(G) SLI training license: \$50

(c) Other administrative fees:

(A) Delinquency fee: \$40 for each year the license is inactive for up to three years.

(B) Replacement of license, including name change: \$25.

(C) Duplicate license document: \$25 per copy, with a maximum of three.

(D) Affidavit of licensure or credential: \$50.

(E) An additional \$25 administrative processing fee will be assessed if a non-sufficient funds or non-negotiable instrument is received for payment of fees, penalties, and charges. Refer to OAR 331-010-0010.

(3) As of June 8, 2024, an individual applying for or renewing a SLI educational license may be granted a discount if the individual meets all application or renewal requirements for an SLI educational license listed under OAR 816-025-0040 and OAR 816-025-0050 and resides in Oregon. The discounted fees are listed below and may be granted through July 1, 2025:

(a) SLI educational license application fee: \$75.

(b) SLI educational original license fee: \$100.

(c) SLI educational renewal license fee: \$100.

STATUTORY/OTHER AUTHORITY: ORS 676.572, ORS 676.576, ORS 676.753, ORS 676.756, ORS 676.759, ORS 676.762, ORS 676.765, ORS 676.768

STATUTES/OTHER IMPLEMENTED: ORS 676.572, ORS 676.576, ORS 676.753, ORS 676.756, ORS 676.759, ORS 676.762, ORS 676.765, ORS 676.768, ORS 676.786

# **Item for Board Action**





## Issue statement

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HEALTH LICENSING OFFICE  
Board of Sign Language Interpreters

### Issue

The Board of Sign Language Interpreters must establish rules due to passage of HB 2696 (2023) including licensing qualifications and board governance.

### Recommendation

Vote to adopt permanent rules.



# Rule Schedule

HEALTH LICENSING OFFICE

## Board of Sign Language Interpreter

Date	Action	Time
December 13, 2023	HLO temporary rule effective and HLO temporary licensing begins and <a href="#">outreach information</a>	
January 1, 2024	<ul style="list-style-type: none"><li>• Operative date of bill</li><li>• Mandatory licensing required</li><li>• Limited waiver on enforcement begins</li></ul>	
January 3, 2024	Board meeting	10 a.m.
January 4, 2024	Board meeting	10 a.m.
January 22, 2024	Communication and outreach for Rules Advisory Committee	
January 31, 2024	Date members must be licensed, if required	
February 29, 2024	Rules Advisory Committee meeting - Cancelled	10 a.m.
March 13, 2024	Rules Advisory Committee meeting	10 a.m.
March 20, 2024	Board meeting – approve proposed rules	10 a.m.
April 1, 2024	Notice of proposed rules published in Oregon Bulletin & first day of public comment	
April 13, 2024	Deadline to notify legislators 49-days before the adoption, amendment, or repeal of rule	
April 16, 2024	Public hearing	9 a.m. to noon
April 28, 2024	Last day for public comment	Noon
May 15, 2024	Board meeting adopt permanent rules	
June 7, 2024	HLO temporary rules and the Board extenuating circumstance temporary rule expires	11:59 p.m.
June 7, 2024	Limited waiver on enforcement expires	11:59 p.m.
June 8, 2024	Board permanent rules effective	12:00 a.m.

# **Director's Report**



May 15, 2024

To: Stakeholders and Interested Parties

From: Derek Fultz, Executive Assistant

Subject: Board of Sign Language Interpreters - Board Member Recruitment

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### **Board Membership**

The Board of Sign Language Interpreters (Board) is made up of 7 members including 2 individuals who are deaf, deafblind or hard of hearing and represent an association who promotes and protects the rights of persons who are deaf and hard of hearing, 1 individual who represents a professional organization in Oregon for sign language interpreters, 1 individual who represents a sign language education program at a post-secondary Oregon institute, two individuals who are hearing interpreters that have been certified or registered with a national organization for sign language interpreters, and 1 individual who is a deaf interpreter certified or registered with a national organization for sign language interpreters. Members are appointed by the Governor's Office of Executive Appointments based on qualifications set forth in Oregon Revised Statute (ORS) 676.780, as well as an individual's experience and demographics to ensure an accurate representation of the profession and the state of Oregon.

### **Recruitment Process**

The Health Licensing Office (HLO) utilized public testimony, interested parties contact lists, press releases, various state publications, and professional/community outreach to fill board member positions. As part of the appointment application process interested individuals provide a personal bio, demographic information, resume and must complete a supplemental questionnaire. All information provided as part of the application process is used during the appointment decision making by the Governor's Office. Submitted applications will be used to fill vacancies for up to a year after submission.

### **Term Limits and Reappointment Process**

Board members are appointed to a four year term and have the option of serving two full terms. Individuals whose first term limit is less than half of a full term (less than two years) have the option of serving the abbreviated term, and an additional two full terms. Prior to the end of an individual's term, the member is provided instructions for reappointment if the member decides to serve again. If the reappointment process is not completed within 90 days of a member's first term ending, that member may be subject to replacement by the Governor's Office.

### **Board Member Training**

Individuals who are appointed to an Oregon Board, Council or Commission are required to complete annual trainings which help to define a member's role and responsibilities while serving and to ensure that the values of the Oregon Health Authority and the state of Oregon are reflected when conducting board business. Training modules include:

- [DAS – CHRO – Overview of Boards and Commissions](#) (required once per term)
- [DAS – EIS – Information security Training: Foundations](#) (required annually)
- [DAS – CHRO – Preventing Discrimination and Harassment](#) (required annually)

## Current Board Members

Board Member/Position	Current Term	Current Term Expiration	Reappointment Status
<b>Jack Ludwig</b> (Chair)	1 <sup>st</sup> Term	12/31/2026	Can Reappoint
<b>Colleen Thayer</b> (Vice Chair)	1 <sup>st</sup> Term	12/31/2025	Can Reappoint
<b>Al Mascarenas</b>	1 <sup>st</sup> Term	12/31/2024	Can Reappoint
<b>Audrey Ramirez-Loudenback</b>	1 <sup>st</sup> Term	12/31/2026	Can Reappoint
<b>Eric Crook</b>	1 <sup>st</sup> Term	12/31/2024	Can Reappoint
<b>Mish Ktejik</b>	1 <sup>st</sup> Term	12/31/2026	Can Reappoint
<b>Tammy Adams</b>	1 <sup>st</sup> Term	12/31/2025	Can Reappoint

**Jack Ludwig** - Individual who identifies as deaf and represents an association who promotes and protects the rights of persons who are deaf and hard of hearing.

**Colleen Thayer** - Individual who is a deaf interpreter certified or registered with a national organization for sign language interpreters.

**Al Mascarenas** - Individual who identifies as deaf and represents an association who promotes and protects the rights of persons who are deaf and hard of hearing.

**Audrey Ramirez-Loudenback** - Individual who represents a professional organization in Oregon for sign language interpreters.

**Eric Crook** - Individual who represents a sign language education program at a post-secondary Oregon institute.

**Mish Ktejik** - Individual who is a hearing interpreter that has been certified or registered with a national organization for sign language interpreters.

**Tammy Adams** - Individual who is a hearing interpreter that has been certified or registered with a national organization for sign language interpreters.

For additional information regarding board member appointments, the application process or training requirements, please contact Derek Fultz at [Derek.J.Fultz@oha.oregon.gov](mailto:Derek.J.Fultz@oha.oregon.gov) or (503) 373-1915.

# **Licensing and Fiscal Statistical Reports**



## Health Licensing Office

Protecting the health, safety and rights of Oregon consumers

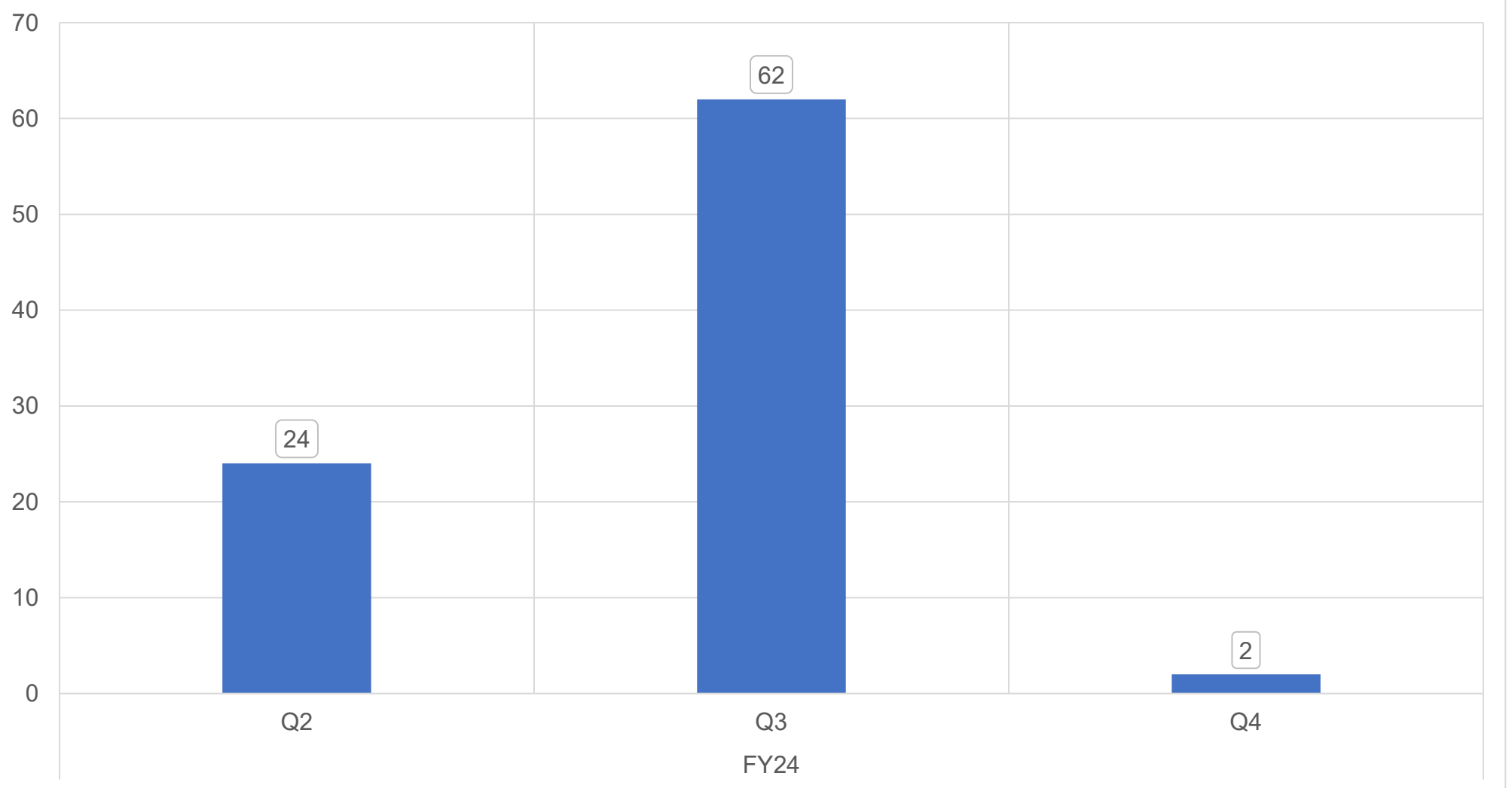
### Board of Sign Language Interpreters

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### Board Report

# LICENSES ISSUED

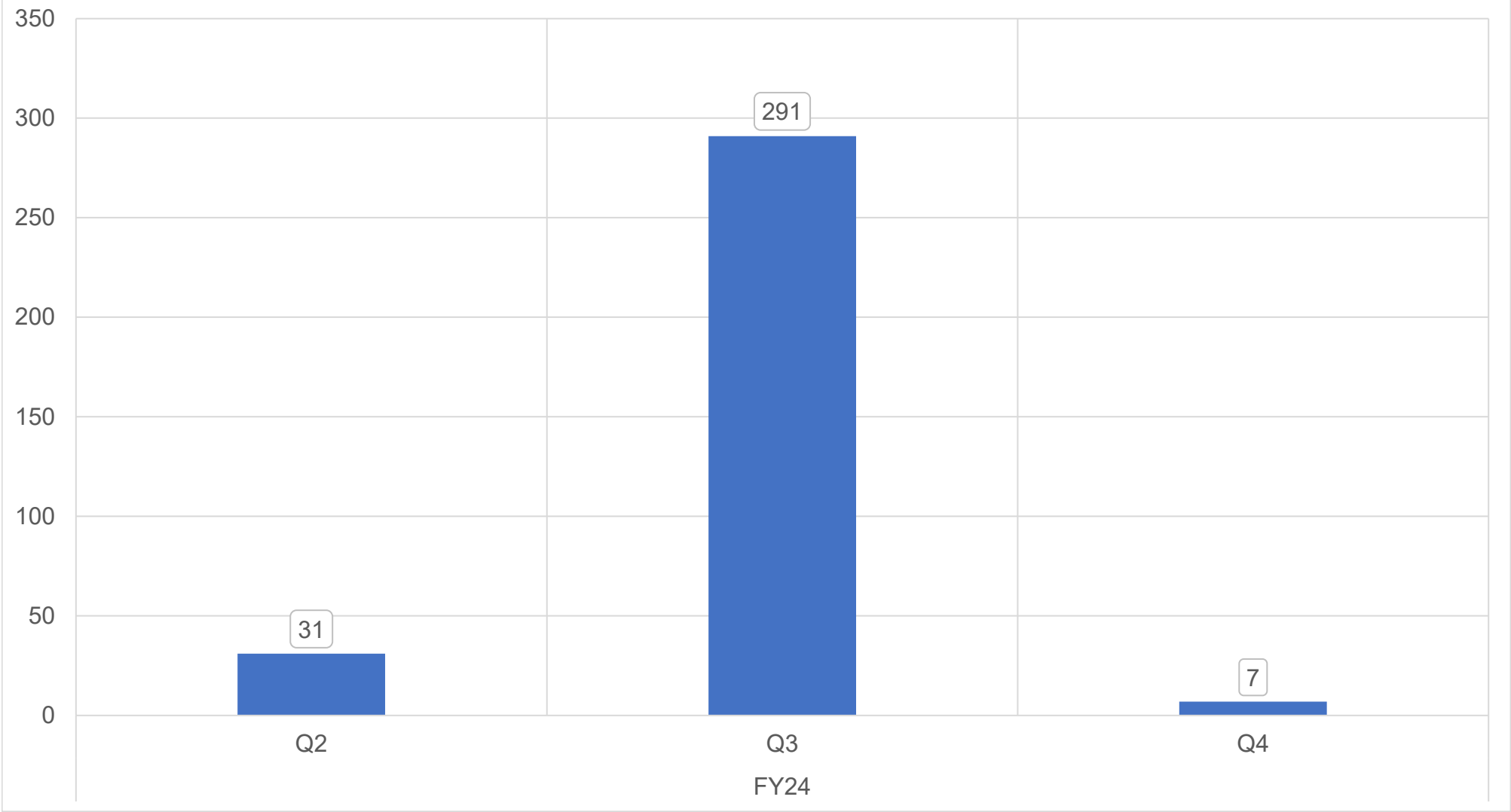
Educational - Temporary



TOTAL ISSUED	FY24	2	TOTAL	88
	7/1/23 - 6/30/24			

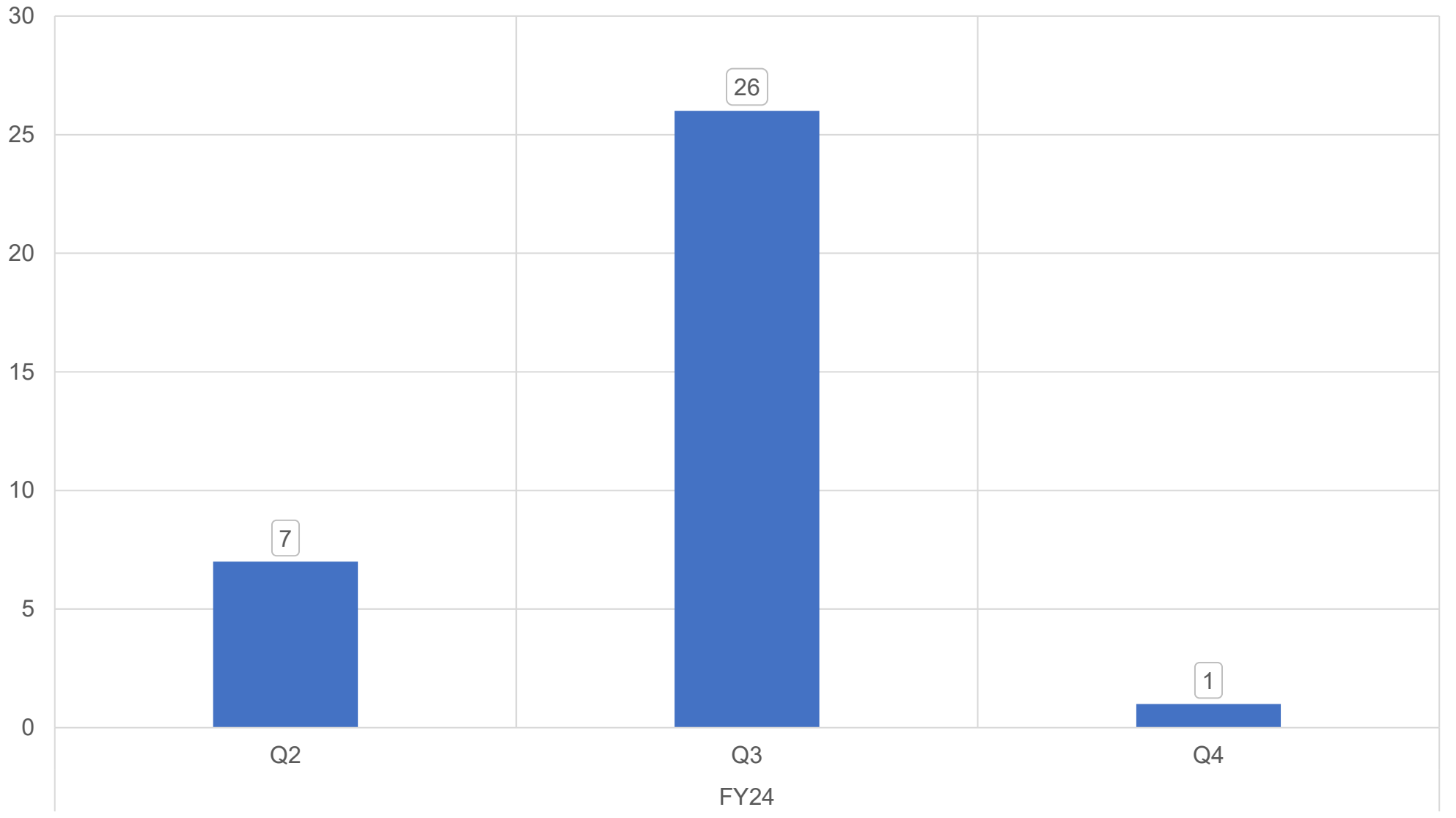


General - Temporary



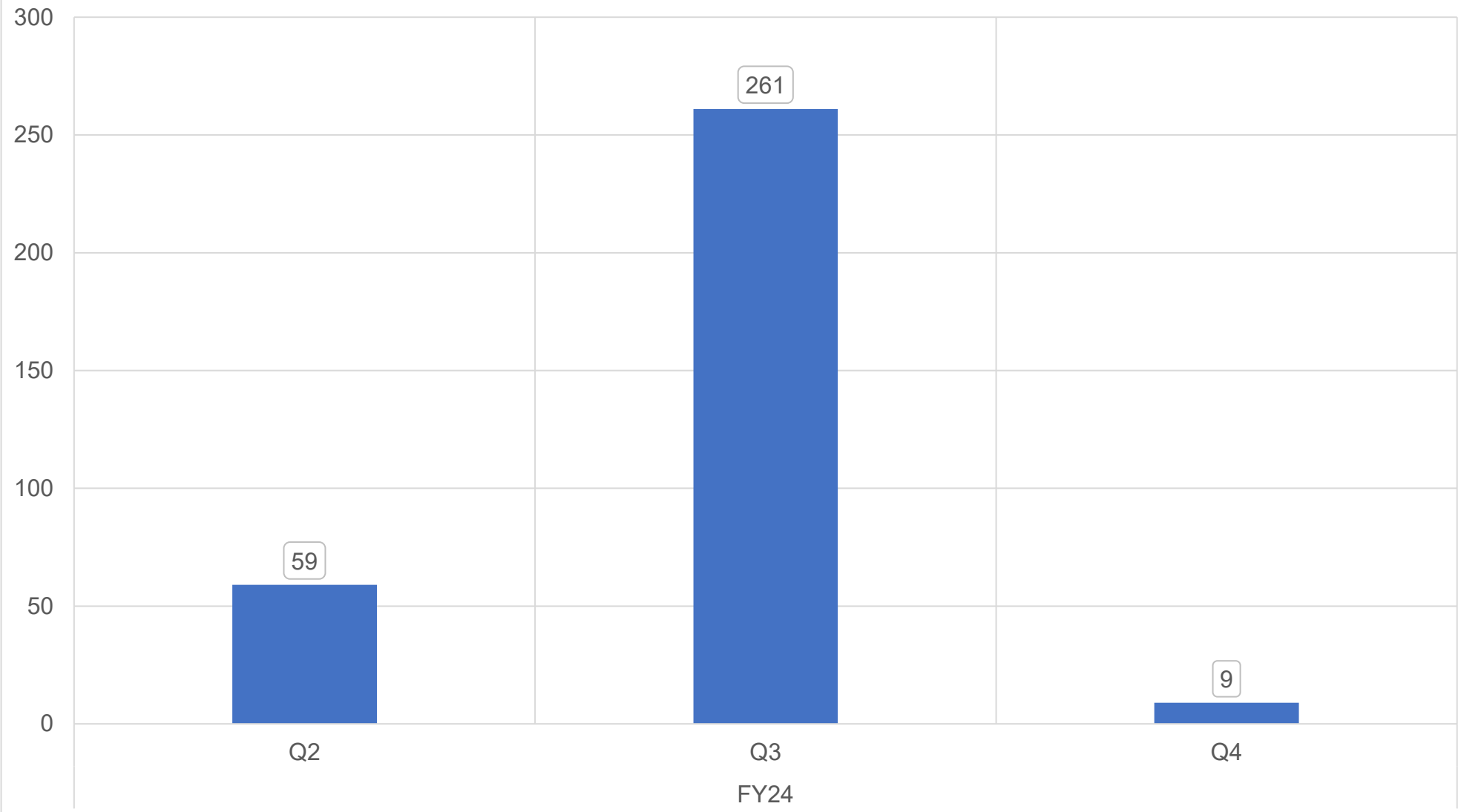
TOTAL ISSUED	FY24	7	TOTAL	329
	7/1/23 - 6/30/24			

## Legal - Temporary



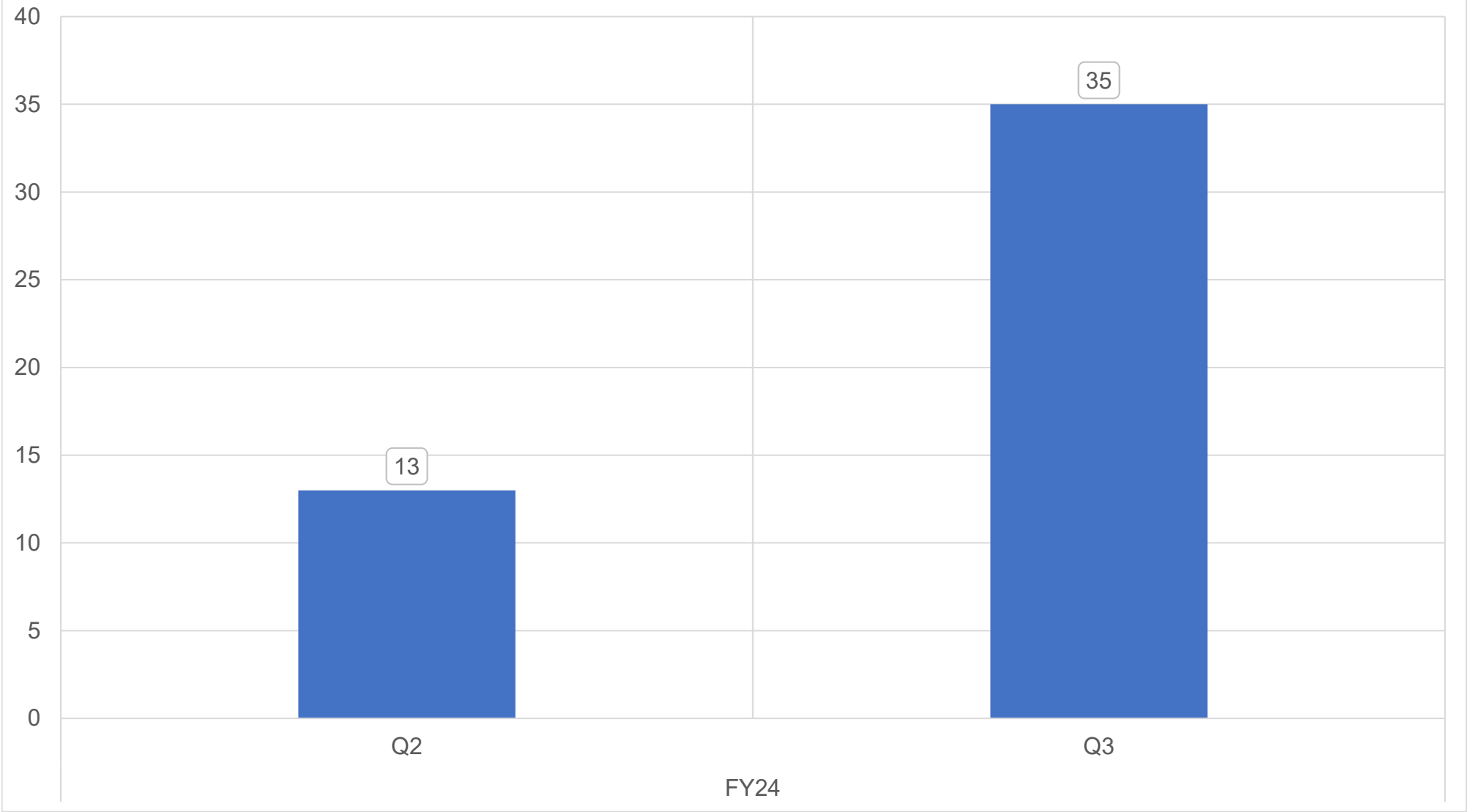
TOTAL ISSUED	FY24	1	TOTAL	34
	7/1/23 - 6/30/24			

Medical - Temporary



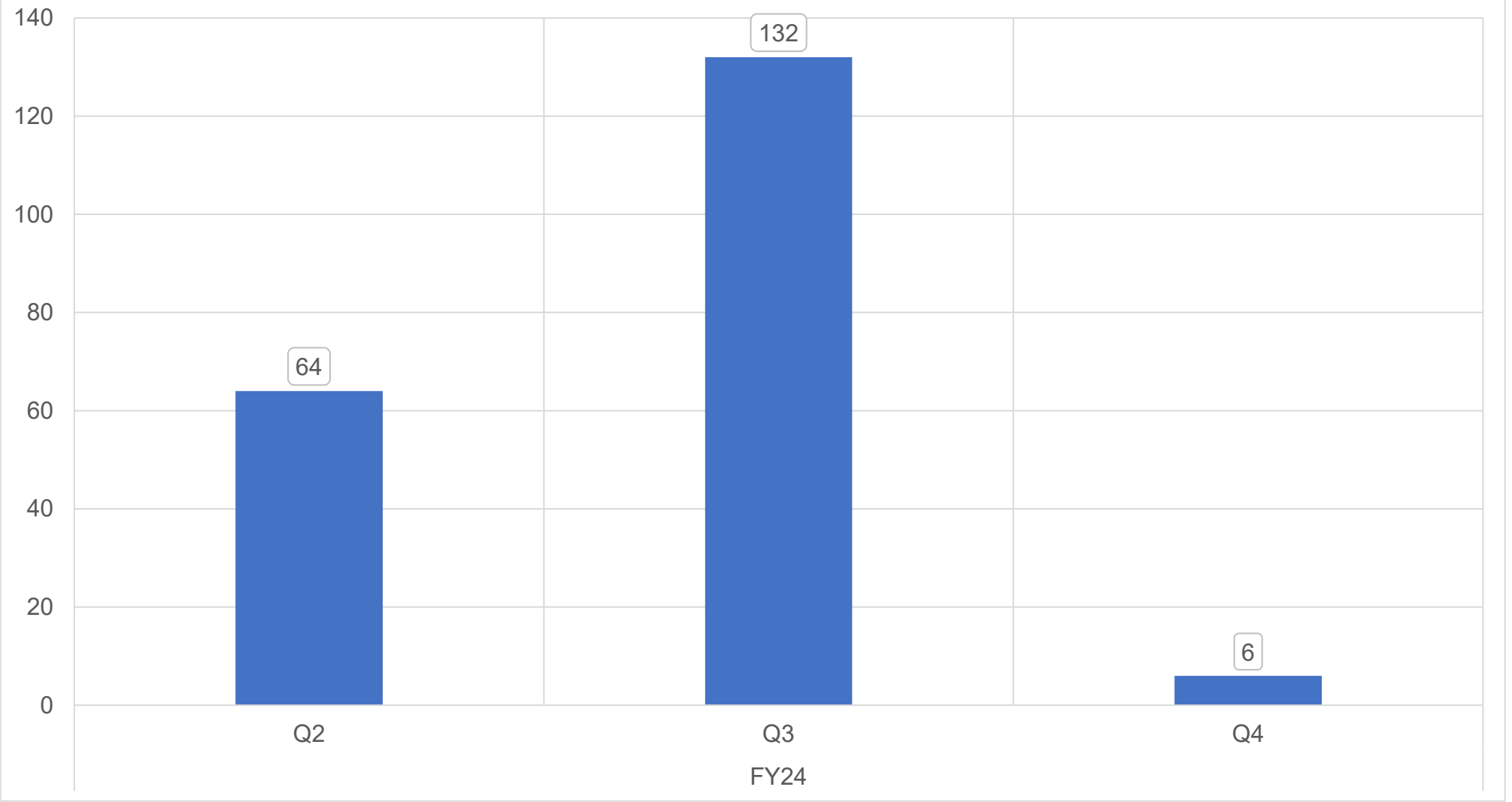
TOTAL ISSUED	FY24	9	TOTAL	329
	7/1/23 - 6/30/24			

Provisional - Temporary



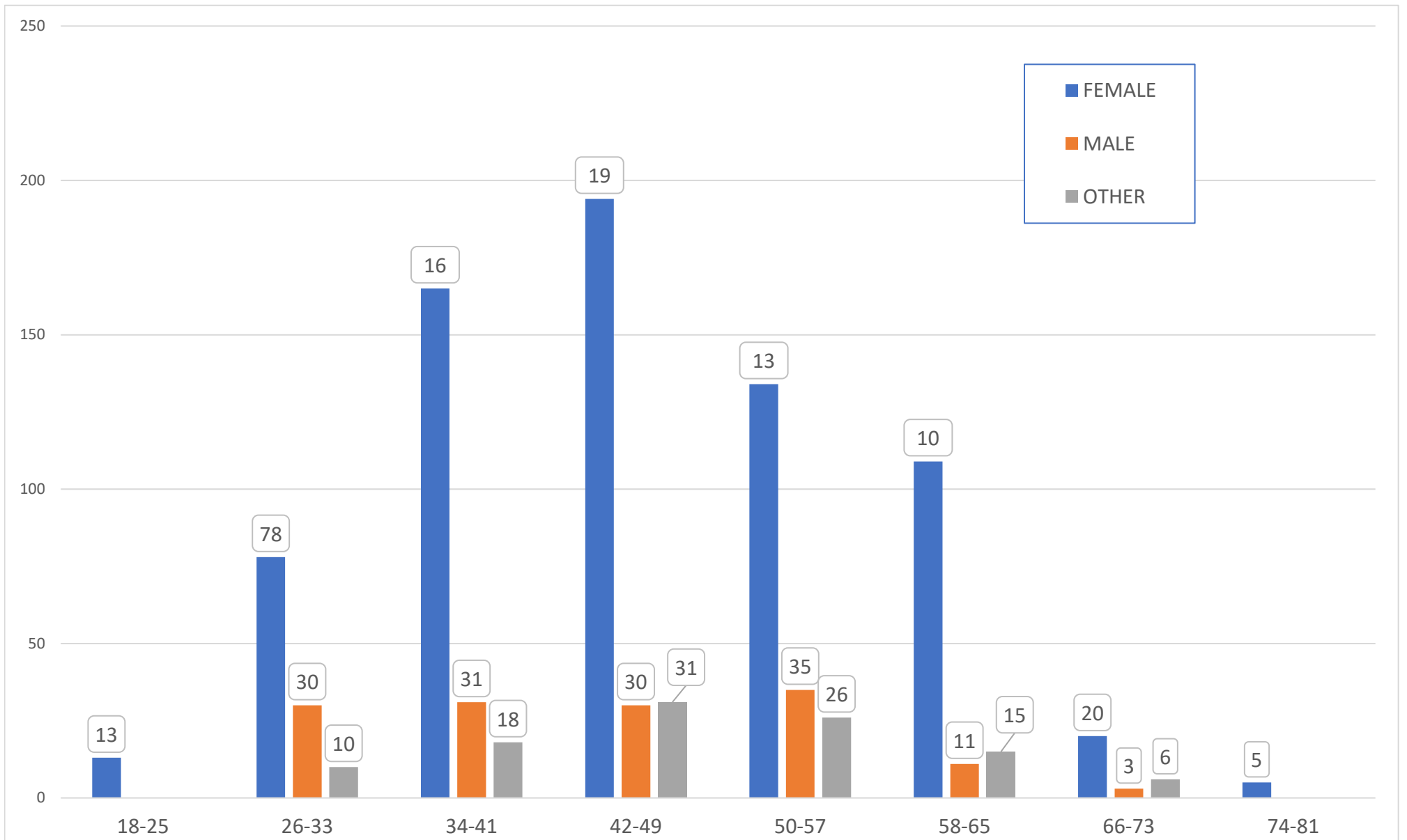
TOTAL ISSUED	FY24	48	TOTAL	48
	7/1/23 - 6/30/24			

Supervisor - Temporary



TOTAL ISSUED	FY24	6	TOTAL	202
	7/1/23 - 6/30/24			

## LICENSES BY AGE AND GENDER



FINANCIAL REPORT	
Budget Period	7/1/2023-6/30/2025
Actuals through	05/01/24

Beginning Balance	\$100,100.00
Revenue AY 25	\$0.00
Accrued Revenue	\$0.00
<b>Expenditures</b>	<b>\$59,121.80</b>
Remaining Balance	\$40,978.20
% Spent	41.00%
% Budget Period	42.00%

Expenditures	
CONFERENCE MEALS AND REFRESHMENTS	\$2,178.10
INSTATE MISC BUS EXP-BOARD/COMM MEMBERS	\$291.20
PROFESSIONAL SERVICES CONTRACT-SIGN LANG	\$840.00
PROFESSIONAL SERVICES NON-IT	\$4,317.50
PROFESSIONAL SRVCS CONTR-INTERPRETERS	\$7,027.50
STATE ATTORNEY LEGAL SERVICES	\$44,467.50
<b>TOTAL</b>	<b>\$59,121.80</b>

# Sign Language Interpreters Board

State Fiscal Year	<i>Biennium</i>		<i>2023-2025</i>		<i>2025-2027</i>	
	2024		2025		2026	
	(Jul23-Current)		(Jul24-Jun25)		(Jul25-Jun26)	
Beginning Cash Balance	\$	-	\$	-	\$0	
Revenues			\$	-	\$0	
Expenditures	\$	-	\$	-	\$0	
Net Operations	\$	-	\$	-	\$	-
(Rev - Exp <u>Only</u> )						
Ending Cash Balance	\$	-	\$	-	\$	-



# Policy Report

## Oregon Health Care Interpreter Program FAQs

### Participant/Member Questions

#### Are there any tools for patients to inform providers about their language needs?

Yes, preferred language cards are a tool for patients to communicate their language needs. [Preferred language cards](#) ("I speak" cards) are available from OHA in many languages.

#### What if a patient requests but does not receive an interpreter?

A patient has a right to file a complaint with the entity that denied them the interpreter service. Entities with 15 or more employees must have a grievance process. If the entity does not have a complaint process or the patient does not want to use the entity's process they can file a complaint with:

- ▶ [Oregon Health Authority's Equity and Inclusion Division](#)
- ▶ [Oregon Health Licensing Office](#)
- ▶ [U.S. Health and Human Services Office of Civil Rights](#)
- ▶ [Oregon Bureau Of Labor and Industries](#)

Section 1557 of the Affordable Care Act grants individuals compensatory damages for violations of Section 1557. This is a departure from Title VI of the Civil Rights Act (the previous law on language access), which allowed fines and monetary cuts for noncompliance but did not enable individual patients to sue for discrimination. Staff should understand the potential consequences of noncompliance and be well trained in accessing an interpreter quickly and efficiently.

## General Questions

### **Do the Health Care Interpreter OARs mean that health care providers in Oregon may only work with registered HCIs?**

Usually working with HCIs on the central registry is required, but there are some exceptions. Health care providers and interpreting service companies are required to attempt to find an HCI who is on the Oregon HCI central registry. If no interpreter on the central registry is available, providers and interpreting service companies must document the steps they took to work with someone on the central registry. Once they have completed these steps, they may then work with an interpreter who is not on the central registry who they have determined is appropriate to meet the interpreting needs of the individual with limited English proficiency.

Also, an HCI from the central registry is not required if the health care provider has documented proficiency in the preferred language of the person with limited English proficiency, or if the person with limited English proficiency has an interpreter, they prefer to work with who is not on the central registry.

### **Can a patient work with a family member or a friend to provide interpreting services?**

No, unless the patient is told that interpreting services are available at no cost and the patient declines. In that case, the patient may instead choose to work with an accompanying adult to interpret rather than the credentialed health care interpreter provided by the health care provider.

### **Will OAR requirements lead to a shortage of HCIs in Oregon?**

OHA monitors access closely and does not expect there to be a shortage of HCIs or a reduction in meaningful access to language assistance services. There are currently more than 1,300 interpreters on the Oregon HCI central registry. HCIs on the registry have reported that they have significant additional availability to provide interpreting services.

In addition, while these changes to the law require health care providers and interpreting services companies to find an HCI on the central registry to work with, the rules also provide a pathway for working with an HCI who is not on the central registry, when necessary.

### **What steps does a health care provider or interpreting service company need to take when arranging for an HCI and what do the rules mean by “good faith effort”?**

Health care providers and interpreting service companies can view this additional guidance document on meeting the [“good faith effort”](#) requirement. This guidance was developed by the Oregon Council on Health Care Interpreters, in collaboration with OHA. Upon request, health care providers and interpreting service companies should be ready to share with OHA, or with the appropriate licensing or certification board, the policies and procedures they have developed for locating and working with HCIs on the central registry and the steps they take when none are available. These processes should include:

- ▶ Steps they take for finding an HCI for a health care appointment,
- ▶ The overall efforts they are making to reduce their reliance on HCIs who are not on the central registry, and

- ▶ How those quality improvement efforts are increasing the number of health care interpreting appointments scheduled with HCIs from the central registry.

## **Are there different requirements for remote interpreting?**

The requirements are the same for onsite and remote interpreting, but there is currently a 1-year transition period allowed for working with HCIs from the central registry when interpreting remotely. Prior to the changes made by HB 2359, some health care providers and interpreting service companies relied on health care interpreters who provide interpreting services from outside of Oregon. Many of these interpreters may have not yet applied to be on the Oregon central registry. OHA recognizes the transition may take time and is accordingly allowing up to one year, until July 1, 2023, to make the transition for interpreters providing services remotely.

Health care providers and interpreting service companies should note that the recordkeeping requirements specified in HB 2359 went into effect on September 1, 2022. OHA may request this information and will use it to assess progress on transitioning to working with HCIs on the central registry. Recordkeeping requirements include:

- ▶ The full name of the HCI,
- ▶ The HCI's central registry number, if applicable, and,
- ▶ The language being interpreted.

## **What happens once the 1-year transition period for interpreting remotely ends on June 30, 2023?**

The requirements for working with HCIs from the central registry will be the same for both onsite and remote interpreting once the transition period ends. In addition to the recordkeeping requirements already in effect for both remote and onsite interpreting since September 1, 2022, health care providers and interpreting service companies will also need to document their "good faith efforts" to work with interpreters on the central registry beginning July 1, 2023.

As a reminder, the OARs are not intended to delay care, and health care providers and interpreting service companies should be developing and implementing business processes to work with HCIs from the registry and to document their good faith efforts to do so well in advance of the end of the 1-year transition period.

## **What can I do if needed interpretation services are not provided by a health care provider?**

Health care providers are generally required to provide interpreting services for their patients who prefer to communicate in a language other than English. If you or others are seeing health care services being delivered without a necessary health care interpreter, there are a variety of things you may want to consider.

If you are comfortable talking directly with the health care provider or the health care provider's office about why interpreting services were not provided, that may be the most efficient way to assure that required interpreting is appropriately provided in the future. If that is not possible, or if there are still concerns, Oregon law (ORS 413.561) gives enforcement authority for health care interpreting services to the agencies and boards that oversee health care providers and health care facilities.

These agencies and boards are outlined in the administrative rules that govern the HCI Program ([OAR 950-050-0010\(10\)](#)). You can use the list here to determine the appropriate place to report

concerns based on the type of health care provider who is delivering services. For example, the Oregon Medical Board for medical doctors and physician assistants, the Oregon Board of Dentistry for dentists, and so on. If the patient in question is on Medicaid, you may also want to connect with Oregon Health Plan staff at OHA. You can find much more detail on how to file a complaint with the OHP here: <https://www.oregon.gov/oha/HSD/OHP/Pages/Complaints.aspx>.

## Health Care Provider/Health Care Interpreter Questions

### **What are the next steps for an interpreter who is not currently on the Oregon HCI central registry?**

To encourage interested HCIs to join the Oregon HCI central registry, OHA has removed all application fees and background checks and streamlined the application requirements. HCIs both inside and outside of Oregon are welcome to submit a free application at any time. You can learn more about Oregon HCI requirements and submit a free application [HERE](#). There may also be free or low-cost training options available to applicants. HCIs who have a nationally recognized HCI credential may already meet the minimum requirements to be added to the central registry or may only need some additional training hours to become qualified or certified in Oregon.

### **If a health care provider is bilingual, do they need to be listed on the HCI registry as qualified or certified in order to communicate directly with the patient in the preferred language?**

No, health care providers with documented proficiency in the preferred language of the person with limited English proficiency are not required to work with an HCI from the registry. Instead, the provider will need to adopt and follow a language services policy consistent with nationally recognized professional standards of care as outlined in [OAR 950-050-0160](#).

### **Does the same exception for health care providers with documented language proficiency apply to bilingual staff who are not health care providers?**

No, only a health care provider, as defined in Section (10) of [OAR 950-050-0010](#), can meet the exception described in Section (1)(a) of [OAR 950-050-0160](#). All others, including bilingual staff working in a health care provider's office, should take the steps necessary to become a qualified or certified HCI on Oregon's central registry prior to providing health care interpreting services. That will help assure compliance with the HCI rules and delivery of high-quality interpreting services.

### **When the HCI rules talk about “public funds,” does that mean all public health services or just Medicaid?**

The term “public funds” is not limited to just Medicaid. Any health care provider listed in Section (10) of [OAR 950-050-0010](#) who receives public funds is required to meet HCI requirements as specified in the OAR.

If a health care provider is reimbursed by the state or federal government directly, or by an entity that receives financial support from the state or federal government to cover the costs of providing health services, OHA considers that to be reimbursement with public funds. Reimbursement from any of the following would count:

- ▶ Medicaid/the Oregon Health Plan,
- ▶ Medicare,
- ▶ The Veteran's Administration,
- ▶ Any medical assistance program administered by the Oregon Health Authority, the Oregon Department of Human Services, or any of Oregon's counties or cities, or
- ▶ Indian Health Services.

**If a health care provider is providing services to a patient who does not utilize “public funds” (for example, they have private insurance), is the health care provider still required to work with qualified or certified HCIs from the central registry?**

The term “public funds” applies to any “public funds” received by the health care provider’s office. Providers who accept no “public funds” would not be required to comply with Oregon’s HCI rules. Otherwise, providers who do accept any “public funds” are required to meet the requirements outlined in Chapter 950, Division 50 of the OARs for all patients seen by their office, regardless of the source of payment for those specific services.

**For walk-in services, if there is not a qualified or certified HCI available at the time of the walk-in, will the person need to be turned away or the service delayed?**

The OARs are not intended to delay care. If the provider has made a good faith effort to find an interpreter in the central registry and one is not available, the health care provider may work with an HCI not in the registry and document the good faith effort to secure an HCI listed in the central registry.

**Do pharmacies have to work with qualified or certified HCIs on the Oregon central registry?**

Yes, pharmacists along with doctors, physician assistants, nurses, dentists, physical therapists, occupational therapists, dieticians, social workers, and many others are all included on the list of health care providers subject to the OARs for health care interpreting in Oregon. You can review the entire list of health care providers required to comply with the HCI rules at [OAR 950-050-0010\(10\)](#).

**Are residential facilities and others providing long-term services and supports required to work with health care interpreters from the central registry?**

Typically, it is a requirement to work with Health Care Interpreters (HCIs) listed on the central registry. However, the same exceptions that apply to all health care providers extend to those providing long-term services and supports. The complete list of health care providers required to work with HCIs from OHA’s central registry is detailed in [OAR 950-050-0010\(10\)](#), and the exceptions are outlined in [OAR 950-050-0160](#).

In addition to these exceptions, the OARs provide a specific exception for individuals providing support for Activities of Daily Living and Instrumental Activities of Daily Living (ADLs/IADLs). This exception is addressed in [OAR 950-050-0010\(7\)](#), which states:

(7) “Health care” means medical, oral, vision, surgical or hospital care or any other remedial care recognized by state law, including physical and behavioral health care. ***For the purpose of these rules, “health care” does not currently include assistance with the activities of daily living or instrumental activities of daily living by providers. The Authority will monitor the exclusion of these services and make a determination on continuing this exception no later than July 1, 2025.*** (emphasis added)

This exception offers a way to work with interpreters not on the registry when providing ADL/IADL supports. When utilizing this exception, providers should document the details in the patient/client file. OHA will evaluate the ongoing need for the ADL/IADL exception as July 1, 2025, approaches. If the

long-term services and supports system has information valuable for evaluating impacts or deciding whether to extend or conclude this exception, OHA welcomes these insights.

## **What does the removal of the background check requirement mean for HCIs?**

During the rule development process, OHA heard from partners that the background check created a barrier for HCIs to apply to the central registry. To address these concerns and help meet the agency's equity goals, OHA removed the requirement for background checks for inclusion as a qualified or certified HCI on the central registry. This change went into effect on July 1, 2022.

Individuals or organizations who employ or contract with HCIs may still require background checks or have other requirements the HCI will need to comply with prior to providing interpreting services. HCIs should work directly with these entities to determine any employer or contract specific requirements.

## **Is the change of requiring some HCIs to become certified after four years of being a qualified HCI, temporary or permanent?**

This change is permanent. At renewal, qualified HCIs may choose to renew for another four years as qualified or, as applicable, apply to become certified.

*Please note that certification is available only in these languages: Spanish, Mandarin, Cantonese, Russian, Korean, Arabic, and Vietnamese. Certification is also available in American Sign Language.*



**If an HCI applicant has taken interpreter training that is not on the OHA list, can some or all of these hours be counted towards the 60-hour training requirement?**

The applicant is responsible to demonstrate to OHA that the training is equal to or above the training requirements contained within the OHA approved training program. Potential applicants may want to contact OHA's [approved training programs](#) to see if previous training can be substituted for some of the 60-hour training they provide. OHA will consider counting these training hours on a case-by-case basis. Additional training programs will be reviewed and added to the OHA list when approved.

**If qualified HCIs are applying to become certified prior to the four-year credential expiring, are they still required to complete 24 CEUs?**

Depending on the amount of time left on the four-year credential, the HCI may not need to complete the full 24 CEUs. The number of CEUs will be prorated based on the number of years left on the existing credential. Dividing the required 24 CEUs (6 in skills, 6 in ethics, and 12 in other topics) by the four-year period, the hours are calculated as follows:

- ▶ 1 year before your expiration date = 18 CEUs needed
- ▶ 2 years before your expiration date = 12 CEUs needed
- ▶ 3 years before your expiration date = 6 CEUs needed

# **Rule Advisory Committee Update**

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**March 13**

**March 22**

**April 10**

## CONCURENT RULEMAKING

Date	Action	Time
March 22, 2024	Rules Advisory Committee meeting	10 a.m.
May 15, 2024	Board meeting adopt permanent rules update on Rules Advisory Committee meetings	10 a.m.
April 10, 2024	Rules Advisory Committee meeting	10 a.m.
June 6, 2024	Rules Advisory Committee meeting - Cancelled	10 a.m.
June 26, 2024	Rules Advisory Committee meeting	10 a.m.
July 18, 2024	Rules Advisory Committee meeting	10 a.m.
August 7, 2024	Board meeting update on Rules Advisory Committee meetings	10 a.m.
August 8, 2024	Rules Advisory Committee meeting	10 a.m.
October 30, 2024	Board meeting	10 a.m.

# **Oregon Department of Education Update**

# **Public/Interested Parties' Feedback**

# **Other Board Business**

**From:** [Jack Ludwig](#)  
**To:** [Bothwell Robert](#); [Patnode Samie](#)  
**Cc:** [Edwards Carrie](#); [Fultz Derek J](#)  
**Subject:** Statement: Fee Structure for SLI  
**Date:** Monday, March 25, 2024 8:05:44 PM  
**Attachments:** [2024-03-25\\_Statement-Fee-Structure\\_HLO.pdf](#)

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**Think twice** before clicking on links or opening attachments. This email came from outside our organization and might not be safe. If you are not expecting an attachment, contact the sender before opening it.

Hi Samie and Bob,

I originally planned to provide the following "abstract" statement during the last Board meeting on March 20, 2024 and submit the full statement via email. Unfortunately that didn't happen due to limited time. Nonetheless, I would like for the HLO to consider the statement and file it into the public records.

**Abstract statement:**

As we know, a primary goal of licensure in all fields is protection for the health and safety of the public. As the Deaf community, we are grateful that Oregon is extending this kind of protection to our population. And while quality in other fields licensed under the HLO is critical, the ASL interpreting field is unique in that it serves an accessibility right protected for all Oregonians under the Americans with Disabilities Act, so it warrants your unique consideration outside of your standard norms.

The currently proposed fees far exceed licensure fees for interpreters in other states, and they are likely to be prohibitive for many ASL interpreters, causing many to leave the profession or our state, which would directly threaten our Deaf citizens' health and safety. I have submitted this statement by email along with further details and references for your examination.

I urge HLO to reevaluate the fee structure for interpreters. It is crucial that any regulatory measures we implement do not inadvertently limit access to essential services for those Oregon citizens protected under the Americans with Disabilities Act.

###

Thank you,  
Jack Z. Ludwig, MS  
Chair, Board of Sign Language Interpreter  
President, Oregon Association of the Deaf

To: Health Licensing Office  
From: Jack Z. Ludwig, Chair, Board of Sign Language Interpreter  
Date: March 25, 2024  
**Subject: Request for Reconsideration on License Fee Structure**

It is widely recognized that certain professions, such as midwifery, athletic training, cosmetology, body art, dietary services, and others, operate within a framework where consumer choice is paramount. These professions, while important, are not mandated by federal law to ensure accessibility. The licensing requirements for these professions are designed to protect public health and safety for those who opt to use these services. However, the situation differs markedly for the Deaf community, where the rights of Individuals who are deaf or have hearing loss of any degree are protected under federal law, reflecting the necessity of ensuring accessibility and inclusivity.

Statistics underscore the pressing nature of this issue: with 211 interpreters certified by Registry of Interpreters for the Deaf (RID) in Oregon and an additional 421 in Washington, the Pacific Northwest is already navigating a delicate balance. Currently, Oregon is home to approximately 1 million individuals who are Deaf or have hearing loss. This figure is derived from the U.S. Census Bureau's estimate of Oregon's population at approximately 4.2 million as of July 1, 2023, coupled with the Centers for Disease Control and Prevention's (CDC) statistic that approximately 24.6% of the general population in the state of Oregon experiences some degree of deafness or hearing loss. This substantial segment of our population relies on the critical services provided by interpreters to navigate daily life, access healthcare, education, and employment, thereby ensuring their full participation in society.

The decision to implement unreasonably high fees for interpreters has been met with considerable concern from both the Deaf and Interpreting Communities, primarily due to its potential to exacerbate the current shortage of interpreters. It is important to consider that interpreters, particularly those who are hearing, have the flexibility to seek employment beyond state borders where licensing is not required, thus potentially leading to a talent drain from Oregon. The implications of this are twofold: it could severely impact the Deaf community's access to effective communication and challenge the state's ability to attract and retain qualified interpreters.

The proposed fees could deter not only local interpreters from continuing their practice but also dissuade out-of-state interpreters from offering their services in Oregon. Moreover, the financial burden might make it unfeasible for out-of-state Video Relay Interpreting (VRI) service providers to operate in the state, further limiting accessibility options for the Deaf community.

The consequences of the proposed fee structure threaten to undermine the principles of the Americans with Disabilities Act by significantly restricting access to effective communication for individuals who are Deaf or have hearing loss. It is imperative to consider the broader implications of these fees on accessibility and inclusivity within our community.

Given these considerations, I kindly urge the Health Licensing Office to reevaluate the fee structure for interpreters as soon as possible. It is crucial that any regulatory measures we implement do not inadvertently limit access to essential services for those protected under the Americans with Disabilities Act. An inclusive dialogue that takes into account the unique needs and challenges of the Deaf community, as well as the professional constraints of interpreters, can help us find a balanced solution that aligns with our shared commitment to public health, safety, and accessibility.