Sign Language Interpreter & Transliterator State Registration Act
Concerns brought to the attention to ODHH over the past 2 years

Section 4 (b)(5)
This exception gives the person who is the deaf the ability to request the use of a non-registered interpreter
  o Commonly known as exception #5 or waiver to use non-registered interpreter
  o See L&I’s clarification document on this exception
  o This exception requires a form—“Request to Use a Non-Registered Interpreter/Transliterator”

Idea: Delete this exception.

Addition: expand Act 57 to hold interpreter referral agencies accountable
Since the law took effect in 2005, this concept has been raised, occasionally. Currently, the act holds the interpreter accountable not the interpreter referral service or an organization who hires interpreters as employees or contractors.

Expand the definition of provisional registration to allow an “alternate method” of eligibility, if the interpreter does not meet the degree requirement for provisional registration
There are interpreters who have been working for many years, however they are not eligible for provisional registration (may be due to the degree requirement and/or application time limitation of 5 years) or state-registration (because they do not have an ODHH recognized national certification).

This idea came to being because the Registry of Interpreters for the Deaf (RID) provides an “alternate pathways” for interpreters to demonstrate their work history, and knowledge in lieu of having a bachelor’s degree. A bachelor’s degree is required to sit for a certification exam. So if their “alternate pathway” documentation meets RID’s requirements then he/she will be approved and then can take the certification exam (part 2). There is not a degree requirement to take the written exam (part 1).

Idea: To do something similarly in PA—provide documentation in replace of the degree requirement for provisional registration.
**Section 5.1(c) Renewal**
An interpreter applies for provisional registration once and renewal twice, consecutively. An interpreter can be provisionally registered for a maximum of 3 consecutive years. This gives the interpreter 3 years to hone their skills through work experience in order to take the certification performance exam (part 2). Once nationally certified, the interpreter will be eligible for state-registration.

The act was amended to add provisional registration. At the time PA Registry of Interpreters for the Deaf (PARID) & PA Society for the Advancement of the Deaf (PSAD), was in support of the 3 years, because the interpreter graduated from an interpreter education program (IEP) and has passed the knowledge exam (part 1) of the certification exam therefore 3 years is ample time to obtain certification and state-registration.

**Idea:** To increase the 3 years provisional registration time period to 5 years to be in line with RID’s 5 years to take and pass the certification exam (part #2).

**Expand the definition of provisional registration to allow interpreters who are deaf to apply**
Many interpreters who are deaf do not attend an Interpreter Education Program (IEP), such as Bloomsburg University or Community College of Philadelphia, therefore they are not eligible for provisional registration. Graduation from an IEP within 5 years of date of application for provisional registration application is a requirement.

Interpreters who are deaf do not necessarily attend an Interpreter Education Program because they are designed for interpreters with typical hearing. The college/university may make adjustments to their curriculum to accommodate the interpreter who is deaf, but there still may be gaps in the education/training.

Secondly, because they are not registered, they have very limited work opportunities to improve their skill set to take and pass the national certification performance exam (Certified Deaf Interpreter exam offered by the Registry of Interpreters for the Deaf).

**Fix language pertaining to emergency situations Section 4 (b)(2) & Section 5.1 (b)(5)(iv)**

**Section 4(b)(2)**
States that a non-registered interpreter is permitted to interpret during an emergency when a delay in obtaining a state-registered interpreter might lead to injury or loss

**Section 5.1 (b)(5)(iv)**
States that a provisionally registered interpreter cannot interpret in a critical care or emergency situation

The sections are in conflict with each other.
Add language to the Act to allow ODHH to establish a revolving account
Currently, ODHH collects the state-registration monies in December (of an even number year) and collects provisionally registration monies throughout the year (no specific time). If the funds are not used, the money goes to the General Governmental Operations (GGO) fund at the end of the fiscal year. State Fiscal year runs from July 1 to June 30. ODHH receives its funding from GGO.

Idea: ODHH to have the ability to carry the money over from one fiscal year to the next via a revolving account.

Addition to regulations: Add late fee for provisionally registered interpreters
Currently, regulations impose a late fee on interpreters renewing their state-registration.

The biennial registration fee for state-registered interpreters is $100 and the late fee is $50.

Late fee for state-registered interpreters: regulations, Section 501.2, Fees.

Yearly, to register or renew, provisionally registered interpreters pay $50.

Idea: To set a late renewal fee for interpreter who want to renew their provisional registration.

New concerns from stakeholders
Dr. Jessica Bentley-Sassaman
- Interpreters found in violation of the act should be charged with a misdemeanor.
  - Jessica will gather information from other states and present it to the group.