

**Comments from the “other” responses for each question and the additional comments at the end.**

**Q4 How Many years did it take you to earn your state-registration?  
(follow up question to those who are state-registered)**

Other Responses

- Not answering this, don't think it matters as I did not enter the profession in the traditional manner.
- My NIC results took 9 months to be returned. I took the test three times but it took four years because of that.
- I had been working as an educational interpreter for 19 years. I then took the NIC and passed, which is when I became freelancer state-registered.
- After it became a requirement, it took over 2 years to gain certification
- Became state registered once I was RID certified
- I was already certified when I moved to PA
- I was already certified when I moved to PA in 2008
- I'm from NJ and we didn't have state registry
- I took my CI exam before July 1,2005 but did not receive my results until after the Act went into effect.
- I did not register until I was certified
- Immediately
- Not sure what question wants. I became NIC certified and state registered in 2008.
- I was unaware of the law when I started interpreting. I was simply told by agencies to "get this waiver signed before you start working." I interpreted like this for maybe over a year, and then I took the written and performance tests and passed both on my first try.
- I had my NIC so when I moved here it only took a few weeks to submit everything and get registered.

**Q6 What are you doing to improve your interpreting skills? (question for currently provisionally registered interpreters)**

Other Responses

- Independent skill building on my own time (videos/recording)
- Watch ASL videos and practice interpreting on my own time.
- Purchased DVD and self improving materials focusing on specific areas of growth
- Recently was involved with an interpreting internship
- Online research for news and new signs weekly
- Interpret videos to improve skills
- Self study at home using internet resources

**Q7 If you are not able to state-register when your provisional registration expires, what do you think you will do? (question for provisionally registered interpreters)**

Other Responses

- Along with these checked boxes I will continue to practice improving my skill in order to get certified within the 5 year RID timeline
- Currently live and work in NJ
- unsure

**Q12 My interpreting credentials are (follow up question for those interpreters who are unable to register)**

Other Responses

- 21 YEARS OF EXPERIENCE AS DEAF INTERPRETER, INCLUDING HAVING TAKEN ALL OF THE COURSES REQUIRED
- 3.3 EIPA
- RID: Ed. K-12; EIPA 4.0
- I passed my CDI and am waiting for RID to lift off the moratorium
- Masters degree in ASL/English Interpreting
- RIC CICT and NIC

**Q14 I no longer work as an interpreter in PA because (follow up question to those who are unable to register and no longer work in PA)**

Other Responses

- I moved back to PA. Although I have an Associate's Degree, I have not graduated from an ITP, so I guess I cannot be used provisionally.
- I'm not certified yet so I can't work in PA
- Don't support the act how it is not enforced and too costly for those that don't work often in PA but live here

**Q17 Why did you not attend an ITP/IEP? (follow up question for those who did not attend an ITP)**

Other Responses

- I HAD COMPLETED INTENSIVE TRAINING IN 1995/96 FROM DHCC AND ALL SUBSEQUENT TRAINING IN THE YEARS AHEAD FROM VARIOUS SOURCES..
- WHAT does this have to do with ACT 57 and it's revisions? I did not attend an ITP because getting my business degree and MBA made more sense as I was already fluent in the language and had the interpreting skills necessary.
- I did attend, I just never completed the program...UNFORTUNATELY for me
- I was already working in the field, and decided to try the certification exam before enrolling in an ITP. I passed the exam.

- Coda, then went for certification and have been certified for past 30 years
- I was an educator, with a BA in Deaf Education and a MA in Literacy. I received my interpreter training by members of the Deaf Community. In 2003, aware that state registration was coming, I decided to become certified. I tested for and passed the CI in 2003, and the CT in 2008 (because it was being replaced by the NIC, so I figured I should get that one, too).
- I attended a 6-week program in 1980. It was all that was available in my area (Tucson, AZ) at the time.
- I learned the language from members of the Deaf community without thinking that I would become an interpreter. Later, I realized there was a need for more interpreters and then decided to look into working as an interpreter. I attended workshops to improve my interpreting skills.
- I was interpreting before ITPs began, and I got certified before ITPs were as widespread and available as they are now.
- They didn't have them back then
- Too old, no money.
- ITP don't have a track for CDIs
- Not a goal
- Became pregnant and unable to find the time or money.
- None available at the time for Deaf interpreters - but took the minimum required training to become certified.
- Previous degree in Deaf Education and had signing skills necessary to start interpreting.
- Attended a 1-year transliteration program in OH prior to ITP's establishment and then became certified.
- "Didn't exist when I was training.
- I did NITC...a 10 week program in 1978"
- I learned ASL and taught at a deaf school before interpreting
- Not needed
- I attended the first NITC (National Interpreter Training Consortium) at New York University and passed RID Certification test.
- I became pregnant!
- Location and cost
- I did not intend to become an interpreter. I have Bachelors and Masters degrees in unrelated fields. I worked with Deaf people and started to interpret with the encouragement of the Deaf community.
- I had a master's degree in linguistics and sufficient ASL skills, along with hundreds of hours of volunteer interpreting experience. I didn't need to.
- NA as none existed
- "Certified in 1997
- Programs don't meet my needs"

## **Q18 Bachelor Degree Status (follow up question for those have an associate degree from an ITP)**

### Other Responses

- I have an associates degree
- worked on my bachelor degree afte I was certified.
- Bachelor's was not required when I took the NIC
- I was never provisionally registered but worked on my bachelor's after I was nationally certified
- Worked on my BA degree after completing the ITP after being certified /registered.
- Did not require Bachelor at time of certification testing
- I worked on and completed my bachelor degree after completing the ITP and before the law was passed.
- I do not have a BA/BS and am not pursuing it at this time.
- I do not have a BA. I was certified prior to the BA degree requirement
- I do not have a Bschelor Degree
- I am currently working on a bachelor degree.
- I do not have a Bachelor Degree
- Was never provisionally registered and Received my Backhelors in 2008
- Do not have a bachelor degree

## **Q 19 What barriers did you face in regards to attending an ITP/IEP? (question for all participants)**

- None/NA – 33 responses
- Lack of availability to Deaf community. Only 1 hearing teacher and 1 Deaf teacher. People have never heard of the school and do not know if they can trust your skills. Talk of negativity about "seasoned" interpreters and their willingness to help new interpreters. Classroom skills vs. real life skills. Working with a screen vs. interacting with real people.
- I didn't. I filled out a fasfa and paid student loans after completion of my program.
- lack of critical mass of Deaf people and/or community and interpreters
- Many agencies will not hire you unless you pass the practical element of the NIC, but it can take several years working professionally in the field to have enough skill to pass. You feel as though you're racing against the clock because there's only 3 years to gain the hands-up experience, and are often pushed to pay hundreds upon hundreds of dollars to take and retake the test.
- I'm not sure what you mean by barriers. I
- Program was in moratorium during my freshman year but reopened by my sophomore year. Otherwise, no barriers.
- Affording the program
- I would say there needs to be more of an emphasis on real life mock practice in ITPs
- Really none that I can think of.

- Having ONE interpreting professor caused students to believe there was only ONE way to interpret an assignment. This caused many to fail and did not provide an understanding that word choice and sign choice could be subjective.
- "Pressure to rapidly gain RID certification.
- Pressure from ODHH regarding specifics jobs I was unable to accept, but needing to gain well-rounded experience."
- Not enough students to have courses offered and too many prerequisites
- Working while attending school was a challenge, but I made it work!
- The barrier was not within the ITP but I did not feel prepared for the certification exam upon graduation from the ITP. Since then many changes have been implemented so I think the students are in a better position than I was.
- I had to attend an ITP outside of PA because at the time I was applying to colleges (~2004), I believe there were no B.A./B.S. ITPs in the state of PA. Attending an ITP out-of-state led me to find work out-of-state, and I did not return to PA until 2016.
- Classes being cancelled due to low enrollment. Classes being offered a limited amount of times or every other semester. The lack of a program coordinator/mentorship program. Resources to connect students with certified interpreters.
- Juggling being a mother of two young children with the requirements of the ITP program.
- None. Attending straight out of High School. Accepted into the program; not on a waiting list.
- When I enrolled in the ITP in 2005, the law was not in place. When I graduated, it was (without provisional registration) therefore, my interpreting professor was not certified themselves and could not offer guidance.
- Being able to observe different certified interpreters in the field.
- travel to ccp then Gallaudet
- "Distance from home.
- Paying out of county rate at a community college."
- My instructors were not strong in helping develop my command of the language. I felt unprepared as I approached my senior year, so I took classes at Gallaudet University for the summer months to help develop my understanding of the language and the culture. It was as if the cart was before the horse...teaching us interpreting methods when not having a full command of the language.
- No real "Barriers" other than travel in order to commute. As a non traditional student living on campus was not an option.
- just the frustration of not understanding my deaf professors that used ASL when I first started classes
- I worked full time as a teacher for the Deaf/hard of hearing. I had to take all of my classes at night and I traveled over 2 hours to take classes. There were semesters where the classes offered did not run because there were not enough students to have the class.
- Working full time and being in school full time was a challenge
- class availability

- There are a small number of interpreter training programs available in the state. I had to commute two-four times a week an hour and 45 minutes from home.
- I was working full time and raising a family at the same time.
- It was a distance learning program and I was unable to be on site for one month. It was a four year program and I already had my bachelors degree. It did not make sense for me to continue this path of completing the ITP. I am also a CODA.
- Low enrollment of students caused classes to be delayed or canceled.
- The commute/distance to a program was difficult
- I did not face barriers.
- The largest barrier I faced attending an ITP was that I could not get enough field (real world) experience before graduating. Many Deaf don't want to work with students (even if they are with a mentor). We work in a catch 22 field. You need experience to work, but you cannot work without experience. It is very difficult coming out of an ITP because you can only learn so much from text books, and the classroom. ITP students need to be out in the field. They need more experiences to get their skills up. In being a graduate of an ITP in the last 2 years I personally have experienced constant set backs because there is not enough support for new interpreters. We also are constantly playing catch up with our skills as you are considered new for about the first 5-10 years you work.
- As far as actually getting enrolled in the ITP, the only two barriers were first off all, my school only allowed maximum 20 (or 25 I don't exactly remember) students per grade level and then second was passing the ASL PI exam to continue on in the program.
- Distance, not getting the education I need in order to pass NIC performance exam, expenses, not enough hands up interpreting time, graduating and not feeling ready to interpret
- The program was initially in moratorium but then reopened my sophomore year.
- Financial and time restraints
- Cost of program and locations. NWPA offers little to no programing or training to increase skill and development to interpreters
- There was only one 4 year program in the state accepting students when I graduated high school in 2006 (Mt Aloysius)
- No barriers that weren't broken down
- Not enough interaction with Deaf people.
- A poor instructor throughout the entire program!
- Location
- \$\$\$ and my pay will not change/increase

## **Q22 How should the referral agency be held accountable? (question for those who said referral agencies should be held accountable)**

### Other Responses

- publish/share violations with community
- They assume partial responsibility with the interpreter.

- Removal of accreditation
- This needs to be modified with careful consideration for the status of the workers for agencies. Independent Contractors and Employees are very different. That being said, agencies need to be held accountable to the extent they are able give their classification of workers. If a job is sent to a non-state-registered or provisional CONTRACT interpreter, it is up to the contract interpreter to decline the job if he/she is not qualified to conduct business in that setting or with that client -- request for use forms are NOT and nor should they be the concern of the agency, that being said, if the non-state-registered does not have a form already permitting him/her to work with the client then he/she needs to decline the job. HOWEVER, if an agency has employees the accountability can be more stringent.
- If the fine is no big deal to the agency, they might continue to violate the Act and pay the fine anyway. There needs to be something in place to ensure they follow through. Maybe they should be required to submit a log or report indicating the jobs assigned to provisionally registered interpreters so ODHH can keep track of whether they are abiding by the Act or not....?
- some kind of formal training should be required after a person has been deemed "unqualified" for an assignment in which they performed
- All evidence should be considered. Rural areas have only a few options. Is no interpreter better than a qualified but not certified interpreter? Agencies could be fined at max but a warning seems more appropriate considering circumstances.
- send a qualified team
- the interpreter should be accountable to have the waiver signed if they were requested by the deaf consumer
- ODHH has no enforcement authority so this is moot
- RID has created a serious problem with postponing testing to experienced interpreters that could not help that the timelines do not match which punishes the ITP interpreter who passed the written portion
- I would love to see some kind of rating for agencies based on the services they provide and their professionalism. This could be done through the ODHH site.
- Before deciding on a penalty, I think there should be some more research done to see how often agencies are sending non-registered interpreters to interpret. What are the situations when this occurs? Are there specific types of assignments - last minute requests/evenings/weekends or specific types of assignments that it is difficult to schedule a registered interpreter for? (Full disclosure, I own an interpreting agency, so I am obviously interested in this topic.)
- There should be a tiered system of accountability
- cannot be added to state contracts to be used by state agencies if found to be violating/misusing provisions of ACT 57
- They can only be accountable for their employees.
- lose their privileges to have an agency in the state of PA
- I think the interpreter should be abiding by the DOC and be transparent with their credentials and skill level. They should refuse our accept work on those bases. I do think that the agency should be responsible for communicating with consumers to

ask if a provisional interpreter would be acceptable. The onus should be on the interpreter to honestly represent themselves, however.

- written warning then fine
- and/or warning letter for first offense; 2 week (?) suspension from providing interpreters in PA; then 3 month (?) probationary period of close monitoring before resuming normal functions
- It depends on the severity and repetition of the offense.
- mandated to receive quality training on importance of providing qualified interpreters and the dangers of not
- While this accountability adds a layer of oversight complications, not sure how ODHH would make agencies accountable without a fine, seems there needs to be some level of accountability...recipient of services file grievance? with ODHH & RID
- Loss of their state business license/identity if there is one.
- After 3 violations, the agency should be closed down
- Like the BBB - have a complaint chart and shame them
- not sure. By holding them accountable it will close the gap of the use non-registered interpreters. It will not solve the issue. the concern is how to police the law--that is the issue now. Until the deaf community gets motivated to understand the law and ask for registered interpreters--it will not change. ODHH and PSAD needs to partner on this and do PSA! get the community interested and motivated. ODHH needs to ask Cathy, attorney, if can fine the agencies--I am assuming it may be similar to what happens now--need to build a case. If you have questions, let me know...sharon behun
- This is a difficult situation because this requires an agency to know their interpreters, and skill sets. While some interpreters are qualified by having their forms, and documents signed, with all their t's crossed, and I's dotted it does not mean they are "qualified" as in having the skills to be able to provide equal, and smooth access to communication. A qualified provisional interpreter may be someone who doesn't have for example their EIPA but their skills are above and beyond. I understand standards are important, but just because a piece of paper says this person isn't qualified doesn't mean they don't actually possess the skills needed, and have a Deaf heart. An agency needs to look at the skills of an interpreter, and know where they are at. An agency however does need to follow the rules, and use interpreters who have completed all the necessary testing, and degrees, then look at their skills. I personally have experienced being placed in an assignment I am not qualified for but did not know until after the assignment started that I should not have been there. Did the agency know the nature of the assignment? Who knows. The point is that more questions should be asked of the client before. Sometimes not all of the Who, What, When, Where, Why's, and How's is not enough information.
- # of warnings prior to issuing a fine for first, second, third offense and so on.
- I'm not sure. If money is not an issue for said agency, a fine might not do much to reinforce the concept of accountability. Maybe a requirement of a public apology so Deaf community members are aware that the agency has not complied with the law.



Or maybe a requirement of submitting a report to ODHH of how many registered, non registered, provisionally registered interpreters were assigned to jobs and the nature of each assignment for those who are non registered or provisionally registered. It's extra work and I'm not sure how feasible it is. But maybe that would encourage agencies to comply with the law to avoid the extra hassle?

- written warning from ODHH before a fine, 2nd time should be a fine
- With the extreme shortage of interpreters, sadly it is sometimes necessary to use the exemption. Many excellent interpreters are not registered or certified. They should be urged to do so.
- In addition to a fine, they should be listed as non compliant
- Implementation of software that can assist them in this, continuing education on the law and it's requirements, certification of knowledge tests (similar to HIPAA training)?
- Warning with potential for further penalty if multiple violations
- Repayment of monies collected at jobs where unqualified interpreters are used. These agencies will not follow this law unless it hurts their income profit margin. Maybe then, they will work to ensure more qualified interpreters are available.
- Listed online that they broke the law
- Warning, then fine
- Warning first then a fine if issue with the same interpreter.
- Progressive discipline beginning with a written warning, then fine, then if need be revocation of business license.
- Not sure
- Can only be held accountable for their employee interpreters. Let IRS guidelines regarding contractors they are not accountable for contractors
- Warning then fine

#### **Q24 How should the business (hospital, post office, etc) be held accountable? (question for those who said businesses should be held accountable)**

- publish/share with community - hard to hold private companies available
- They should assume partial responsibility with interpreter.
- I think it is ridiculous that the options presented here are "fine/jailtime/should not" ... this is a consumer protection act not some kind of law intended to prevent criminal behavior. Businesses should be held accountable to the extent that they were aware of their possible negligence. There needs to be some kind of education process set up such that businesses realize that interpreters are professionals. They would never think of hiring "Eric the Electrician" to hook up the new MRI machine at the hospital, but yet they are willing to hire "Susie Signer" to interpret - I feel this comes from a lack of education about the profession and specific skills necessary to perform the job. With the right education and PR from ODHH (putting our registration dollars to good use!) then the customers would be informed and less likely to violate the act.

- Can't be held accountable if ODHH doesn't have enforcement authority
- If businesses are afraid to hire interpreters who are not qualified, they will 1. only hire certified 2. hire interpreters as little as possible
- The interpreter should be accountable to fill out the paperwork
- Years of working in the field should be recognized
- It would be great to have a list of companies and businesses who are Deaf-friendly so also deaf consumers could find places who actually provide the service they need with interpreters. It would be a positive marketing for those businesses.
- This is similar to the last question regarding agency accountability. I think that both agencies and businesses should be accountable, but there needs to be some investigation into how many non-registered interpreters are being used and why. Also, if businesses are going to be held responsible, then I think there needs to be a tremendous amount of education that will need to take place since I don't think most businesses have any understanding of Act 57.
- If they are hiring directly as employees who perform the job of interpreting, then they need to be held accountable. I think you should ask reps from the Deaf community just how one should be held accountable.
- There has to be system in place to identify/track the business then warning/fine and/or 1. warning letter explaining why registered interpreters are necessary and required; 2. complete a training session (video or live) explaining the law and why registered interpreters are required;
- It depends on the severity and repetition of the offense.
- training made available and at least materials that share stories of the dangers of not providing interpreting or not providing qualified interpreting
- Only if they hire non-registered interpreters directly.
- Should pay the Deaf consumers who were violated a large sum of money in addition to a fine paid.
- Publish a list - shaming publicly - Doesn't cost anything to do
- Businesses (and agencies) could be required to take a class about how to hire a qualified interpreter. Share examples of a qualified vs non-qualified interpreter.
- i am not sure how. the goal should be--registered interpreters ONLY working in PA. it will have to happen in steps--ODHH need money and staff to educate business. Can expect them to follow a law that they do not know about! Need money to do an educational campaign!
- same as previous explanation. Shortage of interpreters (and some excellent interpreters who do not register or become certified should be urged to do so.
- Non compliant agency's falling under the act should be treated the same. Fine and listed as a non compliant company/agency
- Some sort of database/program to assist schedulers, continuing education and information on ACT 57, some sort of certificate of training completion (similar to HIPAA training).
- N/A
- Warning with further potential for penalty if multiple violations
- Repayment of monies earned from using unqualified interpreters.

- Listed on a website as wrongdoers
- Also any listing removed from ODHH & RID websites. Also should have a notice posted on ODHH website & on their company website regarding infraction & what steps taken to rectify the issue.
- Should make sure interpreter is qualified and Deaf client understands interpreter.
- They should be warned and educated about hiring qualified interpreters. If they continue to ignore the law then they should be fined.

**Q26 What should be different for deaf interpreters? (questions for those who said the requirements should not be the same)**

- Currently, interpreter training programs are geared toward hearing interpreters. Therefore deaf interpreters don't have a way to provisionally register in Pa. I feel the standards held for hearing and deaf interpreters need to vary.
- certification requirements
- I am unfamiliar with the hoops a Deaf interpreter must undergo and therefore cannot say.
- Since many Deaf Interpreters do not have an opportunity to attend ITP's they should be able to gain provisional registration through other means.
- Their testing should be held in their native language
- Currently the law is structured that only ITPs are acceptable educational options. Most CDIs/DI don't go through an ITP, nor is the ITP curriculum designed for them in mind. There should be alternative educational requirements for DIs e.g. AA degree, BA degree, so many credits in English, course work on Interpreting etc
- They should not be required to attend an ITP.
- Change the ITP requirement but still require interpreter training which can be gained outside of ITPs. Until there are more ITPs prepared to train DIs. There is a great need to grow the number of qualified Deaf Interpreters as well as provide education to hospitals, behavioral health facilities and courts. But there should be stringent training requirements for DIs to get in to the field
- Opportunities for training and becoming certified have not been provided equally for DI's so until that can be comparable, DI's need to be able to be screened for quality.
- A bachelor's degree should not be required.
- Alternate pathway, workshops attended, training hours etc

**Q28 How many years should a provisionally registered interpreter be permitted to work before being required to be state-registered? (question for all participants)**

Other Responses

- If an interpreter is able to maintain provisional registration (gets his/her ceus, is in good standing, maintains some kind of test of skill at a specific level IE VQAS or otherwise) then they should be able to be provisionally registered for life. Given that

we have a monopoly on "national certification" the ONLY current way to become state-registered, interpreters need to be given another method by which he/she can work in the state. The requirements to be provisionally registered need to be modified too thereby allowing additional resources to enter the state of PA and meet the demands of the Deaf community.

- With flexibility to amend in case the NIC is put on hold again, or no longer available.
- In general, I would say 5 years; HOWEVER, due to recent issues with the moratorium on the NIC, questions regarding the NIC's validity, etc., I feel Pennsylvania needs to take that into account. There are periods of time when perhaps the X-year limit must be lifted, also put on moratorium, etc. to match the national climate regarding certification. If interpreters need to be certified and there is no option for certification available, what are they supposed to do?
- Use the same guideline that the certifying body has
- I don't know, but it has taken me longer than 3 years.
- Same amount of time permitted by certifying body to prepare for performance examination
- could be more than 3 but there should be other requirements along the way.. mile markers they should pass to show they are working towards real certification. not just passing through the years..
- Unless there is a problem with the system; ie. what just happened with RID recently
- I think this could be circumstantial- I think 3 years is enough for a full time, working interpreter. As a part-time working interpreter, it may be more challenging to find improvement gains made in a 3 year limit. I also think this could apply to working interpreters who are still working on bachelor degrees--if full time enrolled, making gains in 3 years may be challenging, and a 5 year time line may be better (or even a +1 year for every year in school?)
- I would say 7. These demands on new interpreters are ridiculous. Some of them have only KNOWN the actual language for a couple of years. How are they even possibly able to learn the language AND the process of interpreting in such a short time span?
- Unsure of a "proper" time frame for ITP students to gain the skills needed to pass NIC. It depends on the program in which they were/are enrolled.
- 5 with renewable options as guided by the certifying body

**Q30 How many hours of mentoring is appropriate for provisionally registered interpreters? (question for all participants)**

- 10
- 10
- 10
- N/A WHERE WILL YOU FIND THE MANPOWER TO TAKE CARE OF MENTORING REQUIREMENTS?
- 8
- 25

- It should not be required... An interpreter is self driven. They WILL find their own way to improve.
- 5-10
- My answer to 16 is MAYBE not yes or no. As, mentoring costs money it can be a means to maintain provisional status but should not be required in excess necessarily. However, maybe there should be some minimum number of hours required - especially for those interpreters who are NIC candidates.
- Should not be required
- 12
- 20
- Being an Interpreter does not automatically qualify this one to be a Mentor.
- At least 50 per year
- It depends on the type of mentoring. About 10 hours a week at least.
- 3
- 8 hours is reasonable
- 5
- Mentoring is not available for many provisionally registered interpreters, therefore, it should not be required if the state cannot secure or guarantee mentors.
- 10
- 20 however good luck finding mentors. They are scarce
- 8-10
- mentoring is a personal decision if it necessary for the work environment
- 3
- Depends on each individual interpreter. However, it should be required minimum of 8 hours monthly.
- 8 - 10 hours / month
- N/A
- 10 hours per month with a Deaf mentor
- 6 to 10 hrs
- 10 hrs
- 8
- 10 hours per month
- 5
- 4-6 hours per month
- 4 to 8
- 10 per month (spread out 2 each week)
- 0
- it would vary depending on the skill set of the interpreter
- 12
- If working full time - 20 hrs
- N/A
- 8
- if required I would say 20
- Depends on the interpreter

- 25
- 15-20
- 10
- 20 hrs
- 10
- Highly recommended but shouldn't be required.
- n/a
- 10 or more
- 3
- More than half of the hours a provisional interpreter is working should be under the guidance of a mentorship program. They should be proactive in showing improvements and outcomes to goals set for improvement. If there is an assessment tool for recognize areas improvement needed to pass the NIC or EIPA that should be used to guide mentoring. The mentoring program should be a program/curriculum that is the same throughout the state.
- 20
- 4 or more
- 8-10
- depends. if there are other requirements in place then fewer hrs would suffice if mentoring is the only requirement than more hours
- 20 hours
- If the person is working, a minimum of 10 hours per month.
- 3-5
- 0
- 10-15
- 8-10 hours
- 5, including their "homework" away from the mentor.
- Depends on the skill of the interpreter. Maybe 10 hrs
- 10 hours a month
- 0 In some areas of the state it could be very difficult to work with a mentor
- 4
- Ask a content expert or ITP - I am not a content expert on what is appropriate
- Provisionally registered mentoring hours from college should be included. 100 hours/month
- I dont know. I would consult a mentoring program I am not sure its the number of hours--but rather participate in an "approved" mentorship program by ODHH
- 5-10 hours
- 4
- 6
- I don't believe it should be required but it would certainly help. Maybe 10-20 hrs a month
- 30
- 2 to 4 hours
- 20

- 4
- 20 hrs
- 15-20 hours. Mentoring can also be in the form of teaming with a state-registered interpreter
- 10
- should be a personal choice
- 2
- 10
- 10-16 hours
- I think it should depend on 1) do you want mentoring? 2) full time mentoring- 1hr/week? 3) part time mentoring?- 2 hours/month?
- N/A
- 5-10 hours
- 20-25
- minimum 4 hours per month - however this is only if structured mentoring is available which is currently a problem
- 20
- 15
- I would say half the time they are clocking. Doctors, teachers, many professions require new colleagues to obtain a substantial amount of mentoring. I think interpreting should, too.
- Minimum of 1 year to 3 years. Mentor should "sign off" on skills
- 10
- 10 at least
- 4-8
- 0
- 5-10 hours
- +/- 10 hours/mo.
- 3
- 4
- 2-3
- 40
- 4
- Mentoring time should include independent work assigned by mentor along with interpreting along side a mentor. At least 15 per month at first
- 2-5
- Unsure
- 2-4
- 20
- 10

**Q33 Additional Comments ( question for all participants)**

- "There needs to be a screening system similar to that of the VQAS available for provisionally registered interpreters, so they are aware of the areas in which they are qualified to work. PA should invest in the BEI or a similar test, in case RID folds, or has another moratorium, and interpreters cannot become certified, but are nearing the end of their provisional time frame and would like to continue working. This will help set levels in which interpreters can work and provides another way to match their skill set to their work.

What do people who did not go to an ITP, but are not yet certified to work do to become provisionally registered? How do Deaf interpreters become provisionally registered?

The time frame for renewing provisional registration should be more flexible. Possibly for the remainder of the year that their registration expires, or even as little as a month/week after the registration is up. If this is not possible, a reminder system could be set up in place (maybe a month before it is about to expire) to insure that interpreters pay their renewal fee.

ODHH should not be bound by RID (or whichever entity is running the national restartion and testing) but should follow their rules as best as they can. And not shorten the time frame in which someone can work to become certified by a great amount."

- I think fines need to be substantial in order to be effective.
- I bELIEVE THAT aCT 57 SHOULD NOT BE PUNITIVE TO INTERPRETERS AND AGENCIES, BUT SERVE TO HELP BOTH GROUPS IMPROVE THEIR SERVICE TO CUSTOMERS
- "This survey was too pointed. A survey is to solicit the feedback of members of the community. This was more of a test of support for the decisions which the writer of the survey has already made.

I would also add that there should be no limit to a persons ability to register as a provisional interpreter. Life happens, if an interpreter meets the criteria necessary to be provisional - regardless of whether he/she has let their past registration laps, he/she should be eligible to reinstate his/her status with ODHH. By being punitive and prohibiting a reinstatement of a persons provisional registration ODHH is further oppressing the Deaf community while also stripping interpreters of their confidence and livelihood.

I would welcome a discussion on this or any of my previous points in the survey - thank you.

- PA should consider adopting state licensure or its own certification. With the pass rate of the NIC and it being so volatile, I believe it is not a credible enough documentation to base a law upon. There needs to be another way to ensure the validity of qualified interpreters so that the Deaf community isn't suffering while waiting for provisional interpreters to pass an exam that is nearly impossible.
- I think that it would be appropriate and beneficial for Pennsylvania to change their provisional registration allowance from 3 years to 5 years. I believe that ODHH



should follow the RID standard of 5 years for an interpreter to become certified. When an interpreter takes the NIC, if he/she fails, he/she must then wait another 6 months before able to take the test again. This means that the time line of 3 years, after graduating an ITP and passing their NIC written, is not very realistic for most new interpreters. Especially considering the NIC has around a 20% pass rate.

- I believe in the act, just not so sure why I pay \$100 plus have to submit my certification copies and such. ODHH has the ability to look up my information and for \$100 they should be doing this. And the system should be more accurate and automated for renewals.
- I feel ODHH should be looking for opportunities to provide support for new and provisionally registered interpreters, as well as ALL interpreters in PA so they can provide skilled, quality interpreting service for the Deaf consumers in the state. It seems ODHH is looking for ways to punish those interpreters trying to gain skills and provide communication access for the Deaf Community without providing any means of support.
- My reason for holding agencies accountable but not other entities is because they should know better. I've seen them send non-certified novice interpreters to jobs because they will make more money that way. Hopefully mentoring can start with the agencies leading the charge.
- Because of the issues surrounding the NIC in regards to the moratorium and validity, it would be nice for PA to include other certifications or screenings besides what RID/NAD offers in licensing requirements. I don't think anyone will be surprised if the NIC is put on hold again, is revamped, etc., so it would be wise for PA to consider other tests to avoid shortages of interpreters or an exodus of interpreters to other states that do not require national certification. Several other states offer well-regarded and valid tests, including the BEI, VQAS (Virginia Quality Assurance Screening), etc.
- It is imperative that the members of the Deaf and Hard-of-Hearing community lead the way. Not the hearing interpreters. Deaf and Hard-of-Hearing people should be free to choose whomever they wish to interpret for them whether the person is registered with ODHH or not. The Agencies should not send non-certified interpreters without the permission of the Deaf/Hard-of-Hearing clients permission. Interviews through a Skype like system and video resumes should be in place so that the Deaf/Hard-of-Hearing consumers can make the decision as to which interpreters match their needs the best.
- "Agencies should not be held accountable for using unregistered interpreters because it would be very difficult to police spoken language agencies who tack on ASL and are outside the Deaf Community. Many of these agencies are out of state and find interpreters on the RID database and send them on assignments, knowing nothing about Deaf Culture, ASL, or the interpreter's qualification. Agencies that focus solely on ASL-English, and serve the local Deaf Community already work hard to provide the best interpreters available for assignments. I am concerned that they would be unfairly singled out and penalized for occasionally falling short of best practices, given that the demand for interpreters is currently greater than the supply. Rather I would like to see ODHH reach out to agencies who are providing

interpreters who ""do harm"" and work with these agencies to help improve their practices, rather than simply meet out penalties.

As for interpreters, what can ODHH do to address the problem of lack of interpreters? What structures are in place to help interpreters gain the experience they need to pass the certification exam?

I would prefer to see ODHH counsel, support and build rather than punish."

- Thank you for doing this. As a person who has lived in another country and needed interpreting services, I wouldn't want to have an unqualified interpreter dealing with my personal affairs. I know that feeling of having to trust a stranger with very personal things. If the profession can do more to be a profession and build that trust with the Deaf and hearing consumers, it is worth it. Thank you for taking the time to evaluate this issue.
- PA should have assurance testing that an interpreter must take and pass. (Similar to VA or other states) I feel the NIC is becoming more of a status than a true test of ability. It seems that "politics" have begun to control the agency rather than the members.
- State of PA requirements should match RID requirements allowing 5 years of provisional certification. And moratorium should be honored by PA. as far as extra time available to become certified.
- "Agencies can not be accountable for independent contractors per IRS guidelines on employee vs contractor.

Deaf interpreters must follow the exact same requirements as hearing. Interpreters are interpreters regardless of if they can hear or not. The provisional registration needs to be revised to offer alternative paths not the only way to register is if you graduated from an itp. Provisionals whose registration has lapsed should be allowed to reregister. They should not be penalized for life circumstances. Life happens and to not allow them to reregister (as it is now) is wrong and unfair.

Deaf persons should be allowed to request whom wpever they want. Act57 was to empower deaf person so if you dont allow them to choose who is best for them then you are oppressing them. ADA allows for the deaf person to determine the mosy effective means of communication as too should Act 57. The deaf person can not request in advance because they can not possible know every interpreter in the state. They should be allowed to sign the waiver after the job is complete if they are satisfied with their work. "

- I feel that provisionals should be treated as residents in the medical field. Many are graduating and unable to interpret alone.
- I think Deaf interpreters should be allowed to provisional registered when they passed their knowledge written exam.

- #18 Accept other credentials. I marked no but feel there should be a discussion - there are several good state credentials but those would have to be identified and supported. On-going dialogue is necessary but I feel this is an excellent start to gather information.
- Regarding provisional registration for Deaf interpreters - at least completion of written examination should be sufficient evidence they have completed minimal training
- not sure abt question 19 what other credentials but there was only yes or no. i would need to explore more. I would have liked a "not sure, need more info" option
- "Other credentials should be recognized if they have been vetted or have validity (for example, the BEI credentialing from Texas).

CDIs should be held to the same standards as their hearing counterparts. In that, we also need to be sure that ITPs/IEPs are accessible to Deaf students of interpreting so that they can have deeper study of ASL and English (even if native users) in the same way hearing counterparts do with their native language of English. Parts of the testing system thus far has been prohibitive of Deaf Interpreter certification success and we want to make sure those barriers do not continue.

Regarding credentialing: in other professions, one is not automatically a practitioner of that profession upon graduation until they study for and complete their exams that afford them their title (of nurse, lawyer, etc). Interpreters need to continue working after graduation to hone their skills to become certified/credentialed.

- My biggest frustration is that there are no opportunities to grow as an interpreter and continue professional interpreting experience if a person moves here from another state that has different interpreting requirements. Even while pursuing the NIC it is important to continue interpreting and unfortunately those who did not become an interpreter traditionally through an ITP are not eligible to obtain provisional and are completely stuck while waiting for the NIC. There needs to be other ways to assess skill for CODA's those who pass Video Relay Service screenings, and have X amount of years experience.
- The mentorship requirement could be difficult to enforce dependent upon availability of qualified mentors.
- I am not sure if EIPA Certification is commensurate with RID/NAD Certification. For now, I would say only RID/NAD. Thank you.
- I believe 3 years is adequate time for a provisionally registered person to pass a RID certification if they leave an ITP with a real grasp on ASL and they work for it. It is the same as a person graduating with a degree in law or actuarial science. These graduates leave school then start studying to pass national tests. They are not a Lawyer or Actuary until they pass the test and this is expected and accepted. I do not think we as a field should lower our standard or expectations.
- "if you have qqs--feel free to contact me. Thanks!

- Provisionally Registered interpreters I believe get a bad rap for "not following" the rules. My ITP made me completely aware of what would be required of me when I started working out in the field. When
- We need to have a mentoring website for the state of PA. It is difficult to find mentors in this state and it's only by word of mouth. A website should be in place for all counties and/or cities are listed with available interpreters who are willing to mentor and any specific areas they work in.
- Act 57 Needs changed entirely. Otherwise, Deaf individuals will be the ultimate loser as there will not be enough interpreters and many will go without one on a daily basis due to this money making law that is just absurd.
- Certification has been a huge barrier to many interpreters being able to work. We are lucky to have provisional registration, however, sometimes legislation becomes a barrier to those who are qualified to work but cannot satisfy RID's ambiguous expectations for passing the NIC exam. Would ODHH consider some sort of state licensure that would screen more effectively and allow qualified interpreters to work? The nature of our work is a human service and it is impossible to assess ones' skills through a 2 dimensional medium that is not fully encompassing of all factors of interpreting. A live panel or on the job screening would be more reflective of the work we do rather than a video with unrealistic vignettes as stimulus. It does not even resemble the work we do in the VRS setting. Changing the NIC is impossible at the state level because the task falls on RID. But perhaps we can look to other state licensure to model a more effective system for providing qualified interpreters.
- We have a serious shortage of interpreters in PA and Act 57 the way it is written, only makes it more difficult for interpreters (both hearing and Deaf) to become registered.
- "Act 57 should be expanded to oversee the ODHH. The director of ODHH should be a deaf person and this should be written into the law.
- PA as a whole needs to regulate educational interpreting as much as freelance and agency interpreting. There are "interpreters" working with zero to very low EIPA scores. This is causing children to become low functioning adults. Not to mention irreversibly language delayed.IUs across the state have interpreters listed anywhere from Aides, signers, to professionals. Having a common front would help with pay and availability of good qualified interpreters across the entire state, in all aspects of a Pennsylvanian's life.
- "5 years time limit for provisional instead of 3 is my opinion.

This survey was confusing to follow due to having most questions related to provisional interps and other options needed for choices due to myself already being certified when provisional went into place.

- My main concern regarding the 3 years of provisional registration is that it conflicts with the RID timelines regarding pre-certified and certified. Pre-certified interpreters who have passed the knowledge exam are given 5 years to pass the performance exam. I feel the timelines should be in alignment.

- "Consider EIPA as an exception to work other than K-12. Meaning if you have 3.5 or above you can become state registered, OR the score of 3.5 or above at least allows for further renewal of provisional registration (up to 5 years).

5 year period of provisional registration would match national requirement from RID.

A lack of available structured mentoring is a serious issue. I would love to have a regular mentor and would be open to this being a requirement for registration if such a resource was available. I would pay for mentoring but there do not seem to be any interpreters available.

It seems harmful to the Deaf community that interpreters who are provisionally registered can work in the community for three years and then suddenly are no longer legal to work, yet brand new interpreters out of ITP can enter the workforce. This creates a 'rotating door' for those who need an extra 2 years to become RID certified and otherwise reliable, skilled, professional interpreters are suddenly not allowed to interpret in PA."

- ODHH collects out money and does nothing. IF a terp is not registered ODHH can do nothing. Those of us that are registered follow the law. The law that a Deaf person has to sign a waiver every time is good but it doesn't happen AT ALL and if the Deaf has the choice of signing a waiver on site OR no terp that's a DEFINITE conflict of interest!!!
- Right now a non-registered interpreter can only interpret if they are involved in a practicum associated with a university. This should be changed so that ANY non-registered interpreter can work IF they are teamed with a certified interpreter, so the non-registered interpreter can gain the experience they need to become state-registered while minimizing harm.
- I strongly feel that the law should be changed to provisionals having 5 years, just like the NIC certification allows.
- "I commend the Act 57 Stakeholder group for their concern to not cause any harm to the interpreting community by seeking input from all sides. That being said, I believe there is a delicate balance to strike between protecting the Deaf community from Interpreter-caused harm and eliminating all special circumstance considerations from Act 57 (such as Exception #5) which could result in further harm should an emergency situation arise in a rural area where interpreters are not easily/quickly found. I urge the Stakeholder group to keep in mind that the Commonwealth of Pennsylvania is quite large, and there will certainly be deaf people in rural areas who will be impacted by any changes in the law. Perhaps it would behoove the group to consider amending the Act in such a way that makes it explicit that Exception #5 does not apply to referral agencies. One other thing I believe that the Stakeholder group should consider is that any penalties amended to Act 57 for referral agencies need to be enforceable with respect to out-of-state agencies. As we all know, interpreter referral agencies are now reaching across state

lines, and they may not care what penalties the State of PA imposes on violations if they are located in another state.

I thank the Stakeholder group for their concern for the Deaf and Interpreters in the Commonwealth of PA, and I commend them for taking on this difficult balancing act for the greater good of the Deaf community in Pennsylvania. "

- Three years is not enough time to become certified. It does not make sense that RID set a national standard of 5 years for us to become certified, but Pennsylvania brings it down to 3. It is not enough time; and it is not fair to the interpreters who have been working to suddenly lose their jobs just because of the three year rule in PA. So now they have to find a new profession or move to a different state just because Pennsylvania says three years is enough? How is that serving the Deaf community? You're going to lose a lot of potential interpreters if this continues. I have been a qualified interpreter. I always renewed on time and I got my CEUs in professional studies. The NIC is a very flawed test; and it is not easy to pass. I passed both the interview and performance portions of the exam, yet, still only came within a few points away from passing. Raise the provisional to 5 years to give potential state-registered interpreters a chance to improve to their fullest abilities.
- Thank you! It is time to find a way to make agencies accountable. They are taking advantage of interpreters and the Deaf community and there is basically no realistic way to get work without them at this point. With no accountability, they can get away with anything and only the interpreter will be punished in the end. And if you walk away from an agency that you feel is acting unethically, you may never find enough work to pay your bills without them.
- "I believe there should be some extension given to provisionally registered interpreters who were impacted by the moratorium. I also believe that we should match the 5 year time frame of RID; meaning allowing provisional registration to be 5 years instead of 3. Thank you for this survey and thank you for caring!"
- "Exception 5 should not be eliminated but should be revised. Deaf persons have a right to use and choose who THEY see fit to interpret most effectively for them. The exception should not require the Deaf person to request the interpreter by name prior to the interpreting. With new interpreters entering the field, how will the Deaf person know them all and how can new interpreters gain experience? Bottom line deaf right to choose should not be oppressed.

Act 57's purpose is to empower deaf to be able to have a say along with be protected. Keep this in mind while revising. Act 57 is a civil rights act. It is not a law so jail time can not be imposed to businesses, interpreters or agencies.

Mentoring should be done through programs which have a curriculum and monitored mentors. Working with a said certified interpreter who is being called a mentor should not be accepted as a mentoring means.

Deaf interpreters need to be treated exactly like hearing within the regulations of Act 57.

Eliminate the only means to provisional registration being through an ITP . Include an alternative pathway which includes a screening tool such as the VQAS. Revising the ITP only portion would allow more deaf to become provisionally registered. Alternative pathway with screening, would be more deaf inviting. "

- Interpreters should be held accountable too if they work outside the law, a fine could be applied. It was asked about business and agencies, but not about the individual interpreter.
- The additional fee if you register after the deadline should be removed !! There should be proration if you move to the area any time after the 2 yr cycle ...