

Original: 2556

**Wojciechowski, Catherine N. (GC-LI)**

---

**From:** LI, ODHH  
**Sent:** Thursday, July 27, 2006 9:41 AM  
**To:** Wojciechowski, Catherine N. (GC-LI)  
**Cc:** Coover, Vance C  
**Subject:** FW: Response to the Bulletin

Hi Catherine,

I am forwarding to you an email which we received here at our office regarding comments to the Regulations for Act 57.

Dee Dee Kelser  
Administrative Assistant  
Office for the Deaf and Hard of Hearing  
1521 North Sixth Street  
Harrisburg, PA 17102  
(717) 783-4912 (v/tty)  
(800) 233-3008 (v/tty)

-----Original Message-----

**From:** RBreinich@aol.com [mailto:RBreinich@aol.com]  
**Sent:** Wednesday, July 26, 2006 10:13 PM  
**To:** ra-li-ovr-odhh@state.pa.us  
**Cc:** cbrow2@bloomu.edu  
**Subject:** Response to the Bulletin

Re: Proposed Regulations for Act 57 published in the PA Bulletin  
Date: July 26, 2006

Comment: After reading the proposed regulations there are several comments I would like to make for your consideration:

[1] In Section 501.1 (Definitions), the definition of Office approved certifications includes the NAD National Certification of the Deaf. My concern is that there are no skill levels listed. The NAD National Certification exam rates candidates on levels I, II, III, IV, and V. Levels I, II and III, are generally not accepted within the field as skill levels that are satisfactory to provide services to the public. Levels IV and V are generally considered satisfactory skill levels.

[2] In Section 501.3 (Examinations), I have the same concerns as in my first comment. The omission of what skill level is required to register can result in those with levels I, II, and III to register.

[3] I believe Section 501.5 (d)(Exemptions) is outdated. It was my understanding that the dept of Education will be assuming the responsibility for educational interpreter's qualifications.

[4] I am also concerned that the explanation of where an educational interpreter may interpret. Using the phrase 'school related activities' is open to a very broad interpretation. Does that mean for classes, sports, extracurricular activities such as chess club, school plays? Or does that mean all of the above plus appointments with a school counselor or a school psychologist, a police officer, a social worker, a case worker, a doctor? Is an IEP meeting a school related activity? Does it matter if it is the parent or the child attending the IEP who is deaf? All of these things have happened within this school year. Educational interpreters are concerned that their definition of 'school-related activities' and the Office's definition will not match.

Thank you for your consideration.

07/31/2006

INDEPENDENT REGULATORY  
REVIEW COMMISSION

2006 AUG 10 AM 10:57

RECEIVED

Sincerely  
Rose Breinich  
RBreinich@aol.com

07/31/2006