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Wojciechowski, Catherine N. (GC-LI)**From:** Pam Cospier [pammiec@ptd.net]

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Sent: Tuesday, August 08, 2006 8:26 PM**To:** cwojciecho@state.pa.us; president@parid.org; Stephanie EllisonINDEPENDENT REGULATORY
REVIEW COMMISSION**Subject:** Act 57 comments

To All Concerned,

As a certified, registered and practicing interpreter in the Commonwealth of PA, I have several concerns with the recently published Act 57 regulations. They are as follows:

1) **§ 501.5. Exemptions:** There is currently no exemption which addresses students who have recently graduated from an accredited Interpreter Training Program. I believe the original drafts of this legislature included language to the effect that said individuals had 3 or 5 years (I don't recall the exact figure) in which to obtain national certification. There were provisions for these interpreters to continue to work in the state within that time period. The way the legislature is currently written, it is practically impossible for a recent graduate to work in this state. This is a serious problem as the pool of qualified interpreters is already limited, to eliminate prospective interpreters (read: prospective registered interpreters), poses a significant impact on the already strained supply/demand of working professionals. Hence clear legislature needs to be included addressing working conditions for recent graduates.

2) **§ 501.5. Exemptions:** Sections 5(c, e) pertain to an unregistered interpreter notifying the client/patient that the individual is not registered. After which the client/patient signs a written confirmation to this effect. This poses a conflict of interests in that the deaf/hoh consumer most likely will feel coerced to sign a form presented to them by said unregistered interpreter in that, if they don't sign, they don't receive services or services are delayed. In addition, the deaf/hoh client may or may not have the ability to read and comprehend the written exemption form, thus relying on the unregistered interpreter to convey this information. Also, what if the hiring agency (e.g. lawyer's office, doctor's office, etc.) does not consent to the use of an unregistered individual?

3) **§ 501.5. Exemptions:** Section 5(d) concerning the exemption of educational interpreters is of great concern to me. Like many professional interpreters, I began my career in the educational arena and continue to encounter educational interpreters regularly in the freelance field. While many educational interpreters in our state uphold high standards of excellence, there are those who do not, only to the detriment of deaf/hoh children. One of the original goals of this legislature over ten years ago was to establish a minimum standard for ALL working interpreters/transliterators in the Commonwealth. It is with great sadness and frustration that I've watched the PA Dept. of Education dance their way out of any compliance with this Act whatsoever. They have instead chosen to institute their own 'guidelines' (and I use that term very loosely), with absolutely no oversight, complaints or recourse for the consumers of those services; the deaf/hoh children and their parents. All interpreters/transliterators in this state, be they educational, staff or freelance should be held to the same standard.

Thank you to all of you who have worked so hard to draft this important piece of legislation and who continue to work in refining it.

Sincerely,

Pamela R. Cosper, CI/CT
Certified ASL/English Interpreter
W - 570-204-4028
fax 570-356-7628
pammisc@old.net