

Testimony in Supporting House Bill 4115 and Suggesting Some Amendments to the Draft

February 6, 2019

House Committee on Health Care

Lois M Feuerle, PhD, JD

Good afternoon Chair Salinas, Vice Chairs Nosse and Hayden, and members of the House Committee on Health Care,

My name is Lois Feuerle and I live in Southeast Portland.

I am a certified translator and have been involved in the field of translation and interpreting for more than 20 years, as an interpreter and a translator, as the former coordinator of two state court interpreter programs, as an educator, as an advocate, as a language access consultant, as a member of several advisory boards, and as a member of the boards of directors of both state and national translation and interpreting organizations.

I am submitting these comments as a person who works in the field of translation and interpreting and not as a representative of any of the organizations of which I am a member.

I applaud the work of the House Committee on Health Care and I wholly support the intent and purpose HB 4115, which is to require health care providers and language services companies to use only the services of and only to contract with health care interpreters who are qualified or certified by Oregon Health Authority.

I would, however, like to suggest several perhaps seemingly small but very important amendments to this legislation in its current form, amendments that will make it stronger.

1.

Page, Line, Section	Text	Recommendation	Rationale
p. 2, line 10 ff., Section 4 (3)(a)	Section 4 (3)(a)  An interpretation Services company (ISC) may not employ or contract w/ health care interpreters (HCIs) who are not qualified HCIs, certified HCIs <b>or HCIs who are enrolled in a HCI interpreter</b>	Delete:  <del>HCIs who are enrolled in a HCI interpreter training program approved by the Oregon Council on Health Care Interpreters (OCHCI)</del>	This students-in-training-programs carve-out undermines the rigorous quality goals that HB4115 strives to achieve.  Moreover, it will require administrative resources to track who is currently in a training program, who

	<b><u>training program approved by the Oregon Council on Health Care Interpreters (OCHCI)</u></b>		finished/dropped out, & when they are no longer qualified to be hired under HB4115 -- all just to be able to hire a trainee for the duration of a 60-hour program lasting at most only a few months or even only a few weeks.
--	---	--	---

Without accurate, rigorous and up-to-the-minute updates, this carve-out for interpreters enrolled in a training program will enable the hiring of trainee interpreters of unknown quality who have not completed the OHA qualification and certification processes that have been instituted to ensure a level of quality of interpreting services.

It should be noted that these trainee-interpreters will likely be hired at a rate that is lower than OHA qualified and certified interpreters, which will undermine the goal of ensuring that duly qualified and certified interpreters can earn a living wage.

Finally, it should also be noted that the interpreter trainees hired legally under HB4115 would not be subject to any oversight, requirements or restrictions whatsoever, such as a specified termination date for their special status, adherence to a code of ethics, or the criminal history check required for OHA qualified and certified health care interpreters.

This carve-out will not ensure the quality standards that HB4115 otherwise endorses; it will undermine these standards with only a small number of short-term temporary interpreter trainees to show for it since their enrolled status in a 60-hour program will be of short duration.

2.

Page, Line, Section	Text	Recommendation	Rationale
p. 2, line 42-43 ff.,  Section 4(1)	Section 4 (1)  A person may not operate an interpretation service company in this state  unless the company is registered with the Oregon Health Authority.	Overly broad.  Redraft and narrow the language appropriately	A company that specializes in providing interpreters for patent litigation, arts events or international conferences should not be required to register with OHA because they do not provide HCI services.

If you would like to discuss these proposed amendments or any other aspects of HB4115 that time constraints prevent me bringing up here, I would be happy to provide any insights that I might have.

Respectfully,

Lois Feuerle

Lois M. Feuerle

3036 SE Taylor St.

Portland, OR 97214

[LoisMarieFeuerle@cs.com](mailto:LoisMarieFeuerle@cs.com)

Loie Feuerle

OSTI President

[LoisMarieFeuerle@cs.com](mailto:LoisMarieFeuerle@cs.com)