Good morning. Thank you for this time to address the Board. My name is Martha Ingel. I have been a NC State Licensed Interpreter since 2005 when I moved to the State of North Carolina. I am a working practitioner and an Interpreter Educator. I have been on the faculty of the Interpreter Education Program at Central Piedmont Community College in Charlotte, NC since 2009 and I served as Co-Chair of the program from 2012 to 2014 along with my colleague, James Wilson. Kellie Stewart assumed the role of chair of the program at CPCC this past Fall and is here with us today as well. We are the first A.A.S. Interpreter Education Program in the country to sign an articulation and partnership agreement with Gallaudet University allowing our students to transfer and obtain a 4 year degree in interpreting in a language immersion environment.

I would like to address today the removal of the educational requirement from the North Carolina Interpreters and Transliterators Licensure Law NC GS 90-D specifically the removal of NC GS 90D-7(b) and NC GS 90D-8(c) and express my opposition to this change and let the Board know that there are a significant number of others who join me in opposing this change to the law. While not making assumptions, it seems part of the reason for removal of this requirement revolves around the fact that as of 2012 the National Registry of Interpreters for the Deaf requires a 4-year degree or an equivalent in order for any candidate to take a performance exam. Another apparent reason was to allow 15-20 interpreters who had pre-2008 RID certification yet could not meet the educational requirement the opportunity to obtain full licensure.

For the NCITLB to rely on RID fully for what is codified in the Statute is problematic for the following reasons:

The RID Educational Requirement ONLY impacts interpreters who choose to sit for a new exam. Interpreters with older licenses, prior to 2008 do not need to demonstrate any level of formal education or equivalency UNLESS they wish to sit for a new performance exam.

Removal of the educational requirement for those who obtained RID certification pre- 2008 may make some sense, though as an interpreter educator, I think that is true only on a limited and case-by-case basis. All of us can point to examples of interpreters who have finely honed their skills despite not having a formal higher education, but equally we can point to examples of interpreters who do NOT continue to do anything to advance their skills and do the bare minimum to maintain certification so they can continue to work. Part of the reason the licensure law surely exists is to protect our consumers from the actions of this second group of practitioners. The Board must have had good rationale for adding the educational requirements to the Statute in 2008 coincidental to RID's change in educational requirements to sit for any performance exam. How can it be that now, that rationale has somehow vanished?

Nevertheless, removal of the educational requirement from the full license is one thing, however, of more significant concern and impact on consumers is the Board's decision also to eliminate the 2-year educational requirement from the provisional licensure process.

Now, with no educational requirements needed, individuals will be able to obtain a provisional license with either an A.A.S. in Interpreting OR nothing more than an EIPA score of 3. Keep in mind that an EIPA 3 represents successful conveyance of only about 60% of the source language information AND one can select to test using the Elementary Level PSE Form and still be enabled to apply for a provisional license

that grants free reign to legally work, unsupervised in any setting, including law enforcement, mental health, education, medical, business, etc. for up to **4** years (one year after initial application plus 3 renewals is 4 years). Perhaps, given the fact that this can happen in a cyclical fashion this can do greater damage than the good of accommodating a small number of already certified interpreters to move into the state.

The North Carolina Department of Public Instruction (DPI) has been planning to raise the entry-level minimum for k-12 interpreters to an EIPA 4. DPI acknowledges that many k-12 interpreters will have difficulty obtaining an EIPA 4 without significant effort, studies, and ongoing training and mentorship. At the same time, DPI recognizes the importance of demanding a more advanced skill level from interpreting practitioners who work with the most vulnerable members of the population. When DPI requirements take effect, it is reasonable to assume that those k-12 interpreters who cannot obtain an EIPA 4 may migrate to community interpreting because they **already** have met the minimum standard for a provisional license via an EIPA 3. There will be NOTHING to stop them from doing this. Given the damage that could be caused to Deaf consumers by even a few individuals pursuing this easy path to provisional licensure merits serious consideration and pause when revising legislation. This decision has served to undermine the strength and benefits of the law.

It is now widely recognized that ASL-English Interpreters are practice professionals who must have highly developed critical-thinking and ethical decision-making skills as well as broad general and extra linguistic knowledge to function effectively as mediators between two languages in a broad array of contexts and settings. These advanced skills are typically developed in post-secondary learning environments. Lack of educational development on the part of interpreters will contribute to Deaf community members receiving compromised services. And because interpreters are the only ones who monitor their own work, these services will be rendered by practitioners who are not even aware of the damage they are doing. The only recourse will be for consumers to file grievances post facto to any damages they already have experienced.

Elimination of the two year degree requirement expresses an institutional value on the part of the Licensure Board regarding the work of interpreters and the importance of formal education and effectively places the interpreting profession in North Carolina back into the realm of technical or para-professional and will have an impact on the respect, consideration, and valuation the field receives from various agencies at the State and Local Level. It is difficult to imagine any other profession demoting hard-won and articulated for minimum requirements for practitioners in this fashion.

Finally a matter of significant import is the lack of vetting that this proposal received among stakeholders (meaning licensed members, consumers, educational institutions, and agencies that hire interpreters) prior to being placed for vote before the General Assembly short session in August of 2014 where it was passed into law. This Board has a fiduciary responsibility to protect the interests of these stakeholders as a matter of public safety. It is the whole reason this Board and the NC GS 90-D was established. Many of my colleagues and I had no awareness that this change was moving forward with alacrity. Many first heard of the change to GS 90-D only AFTER it was a fait accompli and notification that the change had already occurred was released. I am not talking about disengaged practitioners. The people who did not know are colleagues from interpreter education programs, members of the NCASLTA Board, members of the NCAD Board, members of NCRID, leadership at major agencies

employing interpreters in North Carolina, and people who have served in a variety of capacities to organize national, state and local level interpreting conferences. These are individuals who regularly attend meetings and hold membership in the broad spectrum of professional organizations associated with interpreting and interpreter pedagogy. None can recall, even though NCITLB representatives had been present at the various meetings over the years, any representatives from the NCITLB clearly defining the proposed changes or seeking feedback or commentary regarding this substantive change from key stakeholders. Had an appropriate survey, inquiry, and feedback process been conducted, the Board would have found significant opposition to the change. Again, these were substantive changes to the law that should have been vetted through a "request for comment" process from the key stakeholders.

I have been asked to respectfully request the Board to provide the following answers and information pursuant to our understanding as to how this decision occurred below the radar of so many dedicated and involved stakeholders:

1. What was the official and formal rationale for removing the educational requirement from both the provisional and the full license? Apparently the board has been working to develop this in the document that was just tabled for consideration.
2. What is the NCITLB's perception of their fiduciary duty to inform practitioners, consumers, educational programs, and major employers of interpreting services of changes of this scope?
3. We request that the Board provide us with complete documentation of all attempts and characterize the Board's efforts to inform licensees and stakeholders, especially those representing consumers in the Deaf and hard of hearing community, of the proposed changes.
4. Please explain in detail the procedures used for vetting the decision to make this substantive change in the GS 90-D Interpreters and Transliterators Licensure Law.

Thank you for your time and thorough consideration of these concerns. We are eager to obtain this information and data to help us better understand what happened and what actions we plan to take going forward. This change to the law cannot be allowed to stand as it is.

I am submitting a copy of these remarks for entry to the minutes of today's meeting. I can provide an electronic copy to the Secretary if that would be helpful.

Thank you.