Arkansas Department of Health
Rules Governing the Advisory Board for Interpreters between Hearing Individuals and Individuals who are Deaf, Deafblind, Hard of Hearing and Oral Deaf & Rules for Licensure of Qualified and Provisional Interpreters
Public Comments Summary

A public hearing was conducted July 25, 2016, at 9:00 a.m. in Room #2508 of the Arkansas Department of Health, 4815 West Markham, Little Rock, Arkansas. No oral comments were received during the hearing.

Written comments were received by the deadline of July 25, 2016, at 4:30 p.m.

Responses to those comments are as follows:

Comment	**Response**
Nelvia Agnew, MSE, Licensed Interpreter	
(comments in attached pdf)	Thank you for your comments. The Advisory Board for Interpreters between Hearing Individuals and Individuals who are Deaf, Deafblind, Hard of Hearing or Oral Deaf (the Advisory Board) created a Subcommittee to review the levels of licensure required to practice in different settings. The Subcommittee included interpreter agency representatives from around the state. It was felt that these individuals would best understand the settings where interpreters work and the skill levels needed for those settings. That Subcommittee met several times and considered many of the same factors you raised, including the lack of interpreters in the State. Ultimately, the Board feels that it is not necessarily better to have an unqualified interpreter rather than no interpreter at all. When there is an interpreter it is often assumed that communication is taking place. However, this may be far from true when that interpreter is not appropriately qualified. Your comments will be considered going

Comment	Response
	forward to determine if some flexibility is needed to accommodate those in rural areas without easy access to qualified interpreters. It should also be noted that Video Remote Interpreting Services can be used when a qualified interpreter cannot be found. When the Advisory Board addresses this issue in the future, it would appreciate input and participation from the interpreting community.
Jeffrey McCrary, Licensed Interpreter	
Public Comment - proposed amendments to the Rules and Regulations Governing the Advisory Board for Interpreters Between Hearing Individuals and Individuals who are Deaf, Deafblind, Hard of Hearing, or Oral Deaf ***SECTION XI – Summary of Credentials:*** *If you look at the proposed rules, under XI - Summary of Credentials, where are RID levels and past certifications in Section D? RID has exempted themselves from the list in Section D. RID has different levels (or past certifications) also. These should be included on the list in Section D.* *I have no problem with setting out in the rules which interpreting assignments individuals are allowed to do, which I personally believe is a very prudent thing to do, however the interpreting assignment list should apply to all, not just State certified interpreters only. It should also include National certified interpreters.* *Section D needs to contain the levels or past certifications of RID, or it should be deleted and we all go by Section A only.* *A better approach would be what Texas has done. They have a more extensive list than ours on interpreting assignments and have a wonderful chart. The advisory board should adopt these rules.* *Below is the Texas Chart and jobs you are allowed to perform. The list is more*	Thank you for your comments. Please see the response to the above comments. The Advisory Board reviewed the BEI list of recommended certification levels, but did not feel that it addressed the concerns in Arkansas. Review of practice settings and certification levels is ongoing and the Advisory Board will continue to look at this issue. When the Advisory Board addresses this issue in the future, it would appreciate input and participation from the interpreting community.

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comprehensive than Arkansas' list. All Arkansas would have to do is add QAST levels to the chart. QAST 1 would go in category A, QAST 2 in category B, QAST 3 in category E, and QAST 4-5 in category H. (The List of Situations and Recommended Interpreter Certification Levels for the BEI in Texas was included in the email and considered by the Agency.)	