

**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 September 3, 2015, 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 September 3, 2015, at 4:30 p.m.

Responses to those comments are as follows:

<b>Comment</b>	<b>Response</b>
Linda Stauffer, Licensed Qualified Interpreter	
1. This email is to let you know that I have reviewed the proposed changes and I am in support of all proposed changes.	Thank you for the comment.
Val Deen, Licensed Qualified Interpreter	
<p>1. On the recommendation of changing the levels for different assignments that a QAST 1 could accept:</p> <p>It say level one could do Parent/Teacher meetings which often end up leading to things on the IEP which should most definitely should have a higher level interpreter with more experience and higher skills. We are discussing someone's education and there for their future.</p> <p>Also it mentions Orientation being that a level one only gets 50 percent of the information I don't believe this is suitable for a level one when we are discussing a person's ability to make a living for themselves. Also Orientations are often more than</p>	<p>Thank you for these Comments. Currently, a Subcommittee of the Advisory Board for Interpreters is considering which level of licensure is appropriate for particular settings. These comments will be sent on to that subcommittee to be considered.</p>

Comment	Response
<p>one person and not where you can stop and ask for clarification. When only about 50 percent of the information is interpreted this is not suitable for work when the client will be responsible for all the information.</p>	
<p>2. The mentoring of having a lower skill interpreter working with a higher skill interpreter sounds great. However, how will this be monitored? How do we know that people will not just placed their without the interpreter willing to do the extra. I would like to see where there is a form or something to prove there was some mentoring going on. Also the interpreter who meets requirements, are they being asked if they are willing to handle the extra load of mentoring and picking up any slack.</p>	<p>As with all oversight by the Advisory Board for Interpreters, this will be a Complaint driven monitoring system. As with any other violation of our Rules, it can be reported and investigated.</p> <p>No higher level interpreter will be required to serve as a mentor to a lower level interpreter; however, if they do choose to do so, it will be their responsibility to ensure adequate communication is taking place.</p> <p>The purpose of this Rule change is to help lower level interpreters increase their skill level at a faster pace.</p>
<p>3. (5) RID Credentials. This seems to be very miss leading of saying that they can do legal in/out of Courtroom. Arkansas already has a law for in the courtroom. I feel that people will look to this licensure and figure that they can do Legal in Courtrooms with no problem. I believe this is misleading.</p>	<p>RID credential holders who are certified may do work in and out of Courtroom; however, they must be certified by the AOC, as you say.</p> <p>This is specified in the Rules immediately following (5) RID Credentials. It states, in bold and italics:</p> <p><b><i>** All in court cases must adhere to Act 237: An Act to Amend the Process for Appointment, Certification, and Regulation of Court Interpreters; and for other purposes.</i></b></p>
<p>4. C. Complaint Process It says with specific time, place, and persons this sounds great for a specific assignments but what about schools districts? You may know</p>	<p>A complaint will be taken and investigated provided the person gives as much specific information as possible. We will change the language to reflect this. Because this is to clarify</p>

<b>Comment</b>	<b>Response</b>
the school district but not the specific interpreters.	current practice, it is not considered a substantive change.