



February 5, 2015

Representative Mitch Greenlick
Oregon State Legislature
House Committee on Health Care
Rep.MitchGreenlick@state.or.us

RE: **NOTICE OF MODIFICATION TO TEXT OF PROPOSED REGULATIONS
House Bill 2419, Item (1) of Section 1 ORS 413.550 (1), page 1, line 20**

Dear Representative Mitch Greenlick:

As Managing Director of the national Certification Commission for Healthcare Interpreters (CCHI), I wanted to offer our comments on the proposed regulations governing healthcare interpreter qualifications in the state of Oregon.

As you may know, CCHI was the first national healthcare interpreter certification organization to receive national accreditation from the National Commission for Certifying Agencies (NCCA) (<http://www.credentialingexcellence.org/ncca>). Launched in 2009, CCHI's sole mission is to create a national, valid, credible and vendor-neutral certification program. CCHI offers two national certification credentials – the Certified Healthcare Interpreter™ (CHI™) (currently available in Spanish, Arabic and Mandarin), and the Core Certification Healthcare Interpreter™ (CoreCHI™) (available for interpreters of all other languages). Our certifications are officially recognized by the state of Washington and California (Workers Compensation Division).

We appreciate the improvements that have been made to HB 2419. We do have some concerns and wish to submit comments for clarification.

The proposed regulation in item (1) of Section 1 ORS 413.550 (1), page 1, line 20, and Section 5 (7), page 5, line 19, states:

“Certified health care interpreter” means an individual who has been approved and certified by the Oregon Health Authority.

We believe the use of “Certified health care interpreter” creates confusion because CCHI is already using this title as a trademarked name of the national certification credential. To avoid this confusion, we suggest rewording and amending the text as follows:

“Oregon Certified healthcare interpreter” means an individual who has been approved by the Oregon Health Authority or an individual who holds a national healthcare interpreter certification by the Certification Commission of

Healthcare Interpreters or the National Board of Certification for Medical Interpreters.

We thank the House Committee on Health Care for its leadership in this arena and for proposing regulations that recognize the importance of having competent healthcare interpreters.

If you have any additional questions about CCHI's work or mission, please contact our Chair Alejandro Maldonado (amaldonado@cchicertification.org) or me at managing.director@cchicertification.org or 571-406-3694.

We look forward to working with the House Committee on Health Care and ensuring that Oregon offer the highest caliber certification and credentialing program to healthcare interpreters statewide.

Sincerely,

A handwritten signature in cursive script that reads "Natalya Mytareva".

Natalya Mytareva
CCHI Managing Director
managing.director@cchicertification.org
571-406-3694

Cc: Carol Cheney, Equity Manager, OHA Office of Equity and Inclusion
Alejandro Maldonado, CCHI Chair