

Chair Rachel Prusak
House Committee on Health Care
Oregon State Legislature
900 Court St. NE, H-489
Salem, Oregon 97301

March 1, 2021

**RE: NOTICE OF MODIFICATION TO TEXT OF PROPOSED REGULATIONS
House Bill 2359, Section 8. ORS 413.556 (1), page 6, lines 43-44**

Dear Chair and Members of the House Committee on Health Care:

As executive director of the Certification Commission for Healthcare Interpreters (CCHI), I want to offer our comments on the proposed House Bill 2359 governing work and qualifications of health care interpreters in the state of Oregon. We greatly appreciate the recognition by the House Committee on Health Care of the importance of utilizing qualified and certified interpreters for patients and their families who are not proficient in the English language and of the necessity to ensure safe working conditions for interpreters working with the patient and the provider in person.

CCHI's sole mission is to develop and administer a national, valid, credible, and vendor-neutral certification program for interpreters working in health care settings. CCHI offers two national certifications available to interpreters of any language:

- *The CoreCHI™ (Core Certification Healthcare Interpreter™)* certification, a full certification at the core professional level which is available to interpreters of *any* language unless a language-specific oral examination exists for that language. CCHI is the only entity in the U.S. offering the core-level certification that is valid and credible. This certification is accredited by the National Commission for Certifying Agencies (NCCA) since 2014 (<https://www.credentialingexcellence.org/p/cm/ld/fid=121> – search by acronym CCHI or full name).
- *The CHI™ (Certified Healthcare Interpreter™)* language-specific performance certification, currently offered in three languages: *Spanish, Arabic, and Mandarin*. The CHI™-Spanish certification was accredited by NCCA since 2012. Interpreters who seek this certification must pass two examinations – the same CoreCHI™ exam and the language-specific oral performance exam assessing their interpreting skills.

CCHI has delivered testing to Oregon interpreters through contracts with the Oregon Health Authority. Our certifications are officially recognized by the states of Washington, California, and Colorado (Workers Compensation Division).

The proposed regulation in item (1) of Section 8. ORS 413.556 (1), page 6, lines 43-44 states:

“Develop testing, qualification and certification standards, consistent with the ***International Medical Interpreters Association*** standards, for health care interpreters for persons with limited English proficiency and for persons who communicate in [sign] signed language.”

It is puzzling by which criteria the mentioned association was chosen. In the U.S., there are three entities administering national certification for interpreters. Two of them are for health care interpreters of

spoken languages: the *Certification Commission for Healthcare Interpreters (CCHI)* and the *International Medical Interpreters Association Inc* (official name registered with IRS is *Massachusetts Medical Interpreters Association*). And one entity offers certification for interpreters of the signed languages – the *Registry of Interpreters for the Deaf (RID)*.

CCHI is the *only* entity in the U.S. that operates certification programs for interpreters accredited by the [National Commission for Certifying Agencies \(NCCA\)](#) and is inclusive of interpreters of spoken and signed languages. NCCA accreditation means that CCHI’s testing and certification processes meet the requirements for certification programs in the U.S. NCCA is the same agency that accredits certification programs for health care professionals, and their accreditation of CCHI’s programs brings interpreters on par with other members of the patient care team. IMIA Inc held a similar accreditation for their Spanish examination in 2012-2017, but it was not renewed after 2017. And while any accreditation is a voluntary process, it offers an important third-party oversight and assurance to the public of the transparent and fair certification process.

CCHI is also the *largest* certifying entity for interpreters of spoken languages in the U.S. As of today, we count 4,575 certified interpreters nation-wide, with 136 of them (including 16 ASL interpreters) in the state of Oregon, and 38 more Oregon candidates in the process of obtaining their certification (see www.certifiedmedicalinterpreters.directory). To compare, IMIA’s Board lists 2,972 certificants across the U.S., with 114 active and 9 inactive credential holders in the state of Oregon (see www.certifiedmedicalinterpreters.org/search-cmi-registry).

We believe it is vital that the state of Oregon develops its testing, qualification and certification standards consistent with the national standards for the interpreting profession. We suggest rewording and amending the text as follows:

“Develop testing, qualification and certification standards, consistent with the **standards of the Certification Commission for Healthcare Interpreters and of relevant interpreter associations**, for health care interpreters for persons with limited English proficiency and for persons who communicate in [sign] signed language.”

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 health care interpreters and of ensuring their safety in the workplace.

We look forward to working with the House Committee on Health Care and Oregon Health Authority and ensuring that Oregon offers the highest caliber certification program to health care interpreters statewide.

Sincerely,



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Cc: CCHI Commissioners