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February 7, 2024

TO: The Honorable Members of Oregon State Senate Committee on Health Care
RE: Opposition to SB 1578

Dear Members of the Oregon State Senate Committee on Health Care,

My name is Katharine Allen. Currently, I am the Director of Language Industry Learning at Boostlingo, a software company providing a remote interpreting platform. Through our partners, our platform provides remote interpreting services to clients in Oregon, primarily in healthcare. I'm also the owner of Words Across Borders, a company providing interpreting, training and consulting services.

I have been in healthcare interpreting for over 30 years - as an interpreter but also in leadership. I am a former president of the California Healthcare Interpreting Association a co-founder of InterpretAmerica and co-author of *The Medical Interpreter: A Foundation Textbook for Medical Interpreting*. I have been advocating for healthcare interpreters and immigrants needing language access since the 1990s.

I am testifying today to ask you to oppose SB 1578 in its current form. I certainly support its goal to improve working conditions and pay for onsite interpreters in Oregon. However, the bill, as written, will cause much more harm than good.

Language access in healthcare is a federal mandate stemming from Title VI of the 1964 Civil Rights Act and currently enforced through Rule 1557 of the Affordable Care Act, among other regulations. All healthcare entities that receive federal funding must provide equal access to care regardless of national origin. For immigrant communities, that means providing a qualified, trained interpreter with minimum delays at no cost to the immigrant.

On the ground, complying with this mandate is a tall order. Healthcare is a huge industry and there are more than 300 languages spoken by immigrants in the United States. Indeed, no single state in the US has enough local qualified healthcare interpreters in all language combinations to cover the demand created by these mandates. Healthcare interpreting services in the US are provided through a combination of local interpreters and a shared network of remote state and national interpreters, who are accessed through language service companies with remote interpreting technology. The network while not perfect, is actually quite an impressive, complex achievement that taps a widespread workforce through sophisticated technology.

The payment and scheduling portal proposed in SB 1578 would break a system that currently provides equitable language access to Oregonians in over 130 languages across the state. The State will have to assume responsibility for the scheduling and payment processes now managed

by healthcare providers and language service companies. The State will also assume more of the federal liability for providing language access currently managed by healthcare providers, while limiting the ability to access the full interpreter workforce required for compliance.

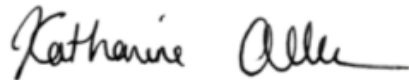
Finally, the State will have to fund a health care portal that is voluntary, with unproven usefulness or incentives for most healthcare interpreters. The management of the portal will be outsourced to a non-profit and provides no guardrail requirements for experience or competence in handling the complex scheduling and payment processes the portal will have to manage.

The portal would worsen existing disparities in healthcare and risk creating a second, inferior tier of care to Limited-English-speaking Oregonians. Its implementation, unless radically rethought, is an unforced error.

It is for these reasons that I urge you to reject the bill in its current form and protect vital language access to all Oregonians who need it.

Any legislation that seeks to support the working conditions and pay for healthcare interpreters in Oregon must take into account the nationalized structure that makes language access in healthcare possible and support *all* healthcare interpreters who provide services in Oregon.

Respectfully submitted,

A handwritten signature in black ink that reads "Katharine Allen". The signature is written in a cursive, flowing style.

Katharine Allen
Founder, Words Across Borders