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February 2, 2024

Re: Vote no on Oregon Senate Bill 1578

Dear Oregon Senator:

We are writing to you today to express serious concerns over Oregon Senate Bill 1578. A small, woman-owned business, Verbio provides translation, interpreting, multimedia localization, and cultural consulting from our headquarters in Beaverton, OR. We are seriously concerned about the detrimental consequences a State-run portal will have for our interpreters, as well as how this will degrade the availability and quality of care for both LEP community members and for health care practitioners.

Verbio is all for better treatment of Interpreters, we are on the same team for that front. We prioritize living wages for highly qualified interpreters within the Pacific NW. Half Verbio's employees are translators and interpreters (including the CEO), so we view our contract interpreters as esteemed additions to our core team. As an Oregon Benefit LLC, we made a legal and ethical commitment to interpreters not just fairly – but quite well - and to pay them promptly. Between 2002-2012, Verbio's CEO ran a professional organization in Oregon offering FREE, monthly training for interpreters and translators. Verbio's leadership and staff remain active participants, elected leaders, and volunteer speakers in multiple professional associations for language professionals (ATA, ALC, etc.). We truly strive to ensure interpreters' professional well-being.

We also care deeply about the welfare of the community where live and work. The current interpreter certification and licensure system overseen by the State of Oregon do not include a sufficient quantity of interpreters to cover all 130 languages needed by Oregonians, across all 36 counties in Oregon.

- Whereas the Civil Rights Act of 1964 (Title VI) prohibits discrimination on the basis of national origin, which means language in this context.
- Whereas the Affordable Care Act (Section 1557) further emphasizes that health care providers must readily have available interpreters for at least the top 15 non-English languages used in each State.
- Whereas Oregon Health Authority already maintains and publishes a public roster of Certified/Qualified health care interpreters. However, OHA only certifies interpreters for seven (7) languages.
- Whereas Oregon Judicial Department already maintains and publishes a public roster of Certified/Registered court interpreters. Yet, OJD only offers certification tests for Spanish and very rarely Vietnamese or Russian.

Verbio is based in Oregon. Most employees live in Oregon. Most interpreters live and work in Oregon. Many of Verbio's customers are in Oregon. We know intimately that Oregonians (including our family members) need interpreters for an increasingly diverse array of languages. Industry statistics indicate



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Oregonians request 130 languages, yet the State interpreter rosters only list a small selection of these languages. Even major languages like French and Portuguese only list a handful of interpreters to cover the entire state. Interpreters for unusual languages are even more difficult to identify, train, and qualify within Oregon – despite being rapidly growing migrant groups in Oregon: Cambodian, Karen, Chuukese, Palauan, Q’anjobal, K’iche, Tigrinya, Lingala.

SB 1578 requires the State to establish a scheduling portal for Certified/Qualified health care interpreters. This portal is designed to do two things: provide a database search of interpreters available at a particular time AND place, plus track payment for the interpreters.

Yet the intention is that interpreters’ participation in the Portal will be OPTIONAL. Interpreters would have to proactively CHOOSE to have their data included in the Portal, a slow bureaucratic process. Other established portals in the industry already fill these roles in addition to featuring advantageous peer networking, continuing education, etc. (Admittedly, certain portals are more trustworthy than others.) Why should an interpreter opt into the State of Oregon’s portal?

Judging by the Licensure program for Sign Language interpreters that OHA is rolling out at present, OHA projects charging fees of \$500-600 per year per interpreter to defray the expenses the State incurs to run a Licensure directory and process. I presume expenses for this new health care interpreter portal under SB 1578 would follow a comparable pattern. If I were a federally certified interpreter (even based in Portland), I would not pay the Oregon government to join this portal since I can pursue work from clientele who pay me instead of me paying them. If I were a remote interpreter (telephone or video) living in Seattle or San Francisco, I would not have any reason to pay the State of Oregon to be registered in this portal.

Private interpreting companies perform ongoing outreach with interpreters (and interpreter trainees) to identify and qualify competent providers for diverse languages and spread geographically across Oregon. Interpreting companies also perform outreach to interpreters in other states, especially for uncommon languages and specialized interpreting skillsets.

Sixty-five percent (65%) of Oregon’s current needs for health care interpreters are filled using remote interpreters. Oregon’s communities outside the Willamette Valley desperately need interpreters. Even Spanish interpreters are scarce along the Oregon Coast, in Josephine and Klamath counties, and across Central and Eastern Oregon. The only real choice for health practitioners in these areas is to use video or telephonic interpreting systems managed by interpreting companies and drawing on quality interpreters across a broad geography. Interpreters who already have enough work from one or several interpreting companies are unlikely to join such a State-run portal. Thus, the portal solves very little for these situations.

It is frankly deceptive to give health care practitioners the notion that using this Scheduling Portal will suddenly solve all the problems of having qualified interpreters support LEP patients in Boardman, Newport, and Burns. Interpreting companies solve problems when no interpreter for XXX language can be found in YYY city or when Oregon Health Authority books a Cambodian interpreter but the LEP speaks Turkish. Interpreting companies rapidly find alternatives when an interpreter gets COVID on the



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day of an appointment. (True stories.) Interpreting companies educate customers about types of interpreting and technologies suited to each need. Interpreting companies build relationships with interpreters to match subject-matter specific expertise to specialized appointments. A portal cannot fill these gaps.

If the State inserts its own Portal system in the middle of health care providers connecting with health care interpreters, the State is assuming responsibility and expenses for:

- Creating the technology system for the portal and the Web developers to build and maintain it: website development, web hosting, maintenance, technical support, etc.
- A team of specialists to vet the interpreters being added to the portal. Even if this work is outsourced to a non-profit, the State needs to qualify and pay the non-profit.
- Federal Liability to ensure the portal encompasses any/all languages requested at Oregon health settings – which presently means 130 languages.
- Federal Liability to ensure sufficient interpreters in rural and remote urban areas of the state
- A marketing campaign to entice interpreters to participate (even while interpreters can find work elsewhere without fees and bureaucracy).
- Delays to providing care to an emergency room patient when the health practitioner cannot find an interpreter for the right language in the portal.

We hope you reevaluate how measures like this affect the ecosystem of a well-developed professional industry. Unlike a robotic database or portal, the knowledgeable and trained staff at Interpreting companies are already a vital pivot point in the service of interpreters, medical providers, patients, and the State. It would be much simpler to establish a Quality Control reporting system within the current Health Care Interpreter Certification program to communicate concerns and facilitate smoother collaboration between health practitioners, interpreters, interpreting companies, and the State.

We urge you to vote no on Oregon Senate Bill 1578.

We thank you for your thoughtful consideration of our concerns.

Best Regards,

Virginia Joplin  
CEO,  
Sworn Translator for France and Spain  
Federal Export Advisor