



Interpreter Commission
Friday, October 2, 2015 (8:45 a.m. – 11:45 a.m.)
AOC SeaTac Facility, Large Conference Room
18000 International Blvd., Suite 1106, SeaTac, WA 98188

MEETING MINUTES

Members Present:

Justice Steven González
Fona Sugg
Dirk Marler
Eileen Farley
Sam Mattix
Thea Jennings
Judge Andrea Beall

Members Attending by Telephone

Kristi Cruz
Linda Noble

Members Absent:

Alma Zuniga
Judge Theresa Doyle

AOC Staff

Robert Lichtenberg
James Wells

Guests:

Berle Ross
Lynne Lumsden

CALL TO ORDER AND WELCOME

The meeting was called to order by Justice Steven González. Members and staff introduced themselves.

APPROVAL OF MAY 29, 2015 MEETING MINUTES

It was noted that one of the interpreter's last names on the minutes was misspelled and should be Hankinson. With that correction, the minutes were deemed approved by the Commission

CHAIR'S REPORT

Introduction of New Commission Member

Justice González asked Mr. Lichtenberg to discuss the nomination of an ASL representative for the Commission. Mr. Lichtenberg explained that after the Commission votes on changes to GR 11.1 to be proposed by the Issues Committee during the meeting, those changes will be submitted to the Supreme Court for approval. When approved, the position for an ASL interpreter representative will be open and Lynne Lumsden will be officially nominated by the Washington State Registry of Interpreters for the Deaf to the Chief Justice. Since the Commission would be discussing important matters relating to ASL interpreters, Lynne Lumsden was invited to attend this meeting.

Mr. Lichtenberg and Justice González welcomed Ms. Lumsden and expressed they were looking forward to her serving in a more official capacity on the Commission.

Justice González confirmed that Mr. Lichtenberg would like the Commission members to update their contact information. The form would be sent out electronically after the meeting.

Forum Debriefing/Action

Mr. Lichtenberg mentioned that two main issues came up during the forum in Yakima on May 29. One issue was people having problems accessing the courts and getting language access in a timely manner. People often have to go to a court multiple times to request access.

The second issue was what type of support the Commission can provide to courts to better serve the people. Some of the problems relate to the American with Disabilities Act (ADA). One suggestion was the Commission could work more closely with the ADA coordinators at the county level.

Mr. Marler and Mr. Lichtenberg discussed the role that Shirley Bondon plays as an ADA coordinator at the Administrative Office of the Courts. She is occasionally available to consult on some ADA issues. However, her primary role is in the Guardianship program and providing courts with consultations involving the ADA isn't her main focus. Her director would need to be consulted if her role were to be expanded. The internal ADA coordinator for the AOC is the Human Resources director.

The Commission discussed who would be responsible for ADA issues in courts. Ms. Farley suggested that in municipalities, the city clerk is sometimes responsible for arranging interpreters of all kinds. It was suggested that whoever was responsible in a court for arranging a spoken language interpreter would also be responsible for sign language interpreters.

Ms. Sugg mentioned that one of the biggest challenges relates to how a court becomes notified that an interpreter is needed. This would be something addressed in the new language access plan. Some last minute requests are easier than others to accommodate. Flagging that a litigant needs an interpreter could potentially be addressed using the new Odyssey content management system, but that still requires that the clerk know that an interpreter is needed and actively adds the information into the system. Also, Odyssey will only be used by the superior courts in the near future. She suggested that when the new LAP template goes out to the courts, the cover letter or memo could explain what the best practices are involving the ADA. But given the number of people involved in providing language access, it might be difficult to eliminate delays from occurring.

Ms. Cruz brought up a discussion that took place in the previous Commission meeting about a letter from the AOC to the courts. The title of the letter suggested it would discuss the ADA, however, there was little information about the issue. A follow up letter

was discussed. Any follow up letter could address how the requirements laid out in the ADA are different from requirements for spoken language interpreters. Also, ADA coordinators work with a lot of issues besides working with ASL interpreters. Ms. Cruz felt that the new LAP template should make sure not to conflate the ADA requirements with the requirements involving spoken language interpreters. The LAP should also be clear that following the plan would not make the court completely ADA compliant since there are other issues, such as large print and braille, which the LAP won't cover.

Mr. Lichtenberg explained that the follow up letter Ms. Cruz referred to hasn't been drafted yet and that he had been working with the Office of Deaf and Hard of Hearing (ODHH) to see what their role is in providing ADA technical assistance to the courts. Ms. Ross explained that she receives phone calls from court customers about who to contact at courts to get language access. ODHH often follows up with the courts to find the appropriate person. It can be difficult to find the person responsible in the court for coordinating access. It would be helpful if courts clearly provided a specific contact person. Mr. Lichtenberg said that the relationship between the AOC and the ODHH is new and may need to be clarified regarding what kind of support the AOC can provide. He explained that he has had experience with the ADA and could provide some support, however, that could result in a duplication of work. When he receives a question about the language access requirements of the ADA, he tends to answer the question himself rather than direct them to ODHH to avoid bumping people around to different agencies. But he informs ODHH of the inquiry and response given.

Justice Gonzalez suggested that the topic be referred to the Issues Committee. The Issues Committee can discuss how the Interpreter Program can work with the ODHH to avoid duplication or tension when providing technical assistance about the ADA. A referral process should be developed if something comes in that is beyond what the AOC can provide.

Mr. Marler mentioned that the AOC maintains a court directory. One suggestion would be to have courts also provide information about who the ADA coordinator is in each jurisdiction in addition to the other information that is regularly updated.

Justice González asked if there was any follow up by members of the public on any of the specific issues brought up during the forum. Mr. Lichtenberg said he was aware that Howard Gorel had contacted the courts in Yakima. Ms. Ross explained that she had been contacted about the matter and that she had difficulty in finding the correct person to reach out to at the court. She mentioned it can be very difficult and can require many phone calls to find the correct person. Judge Beall mentioned that in many smaller courts, the court administrator would be the one responsible for ADA compliance. Justice González suggested that Mr. Lichtenberg draft a letter from the Commission to the Yakima court to identify who would be the ADA contact there.

Ms. Sugg mentioned that she had contacted Snohomish Superior court to let them know that she had heard of some ADA issues there. She didn't request any follow up and was simply relaying information to him.

Ms. Farley suggested that when the Commission sends letters to courts, the letters should also be distributed more widely and not limited to court administrators. The letters can be sent to other institutions that are regularly present in the court, such as the Washington State Association of Prosecuting Attorneys, so that more people are informed on what should happen and that the ideas in the letter become more a part of the culture.

Supreme Court Language Access Plan

Justice González reported that a draft plan had been presented to the Supreme Court over the summer. The Court had a number of questions and also requested something akin to a fiscal note. Over the past 4 years, there have only been 2 requests for an interpreter and so forecasting how often language access would be requested would be difficult. One concern was that once a plan is approved and made public, there may be an increased demand for interpreter services which cannot be anticipated. Another question involved the courts at the appellate level and what kind of coordination there would be with those courts. For example, would the Supreme Court lead the way or would appellate courts have their own plan?

A group of people from the AOC, the Supreme Court, and each of the division appellate courts plan on having a meeting, although a time had not been set. There has also been consultation with the Department of Justice. So far the discussion about the plan has helped educate the Supreme Court and its administration about language access issues.

Justice González clarified the scope of the plan includes both parties and observers. Spoken language access is separate from ADA issues and so far the spoken language plan is the only one that has been presented. Family members and victims are different from members of the public who come to court just to observe a case. This is a concern for some courts in urban areas which often have more observers from the public than rural courts. There are also legal differences in the right to “observer interpreting” between spoken language observers and observers who are deaf or hard of hearing

The Commission clarified that in appellate court there is no witness testimony and cases mainly consist of arguments from the attorneys and questions from the bench. Some argue that since the party cannot speak during the proceeding, there isn't a role for an interpreter. However, that ignores the point that a party has the right to understand their own proceeding and not have to rely on a summary later on. Also, there are times during an appellate hearing when the attorney may discuss matters with their client(s).

One scenario discussed was an LEP party who was expecting to take part in a particular type of proceeding and wanted to prepare by going to observe the same type of proceeding in court before their own case. Without an interpreter, this person's access to justice would be limited. Another scenario discussed was whether or not

someone requesting a recording of a proceeding would have an interpretation of the recording available from the court. It was thought this would be more like a public information request and an interpreter would probably not be made available by the court.

The Commission discussed how the Supreme Court draft LAP was a public document and would be available as an example plan. However, it was noted that the Commission workgroup was in the midst of creating a new LAP template for trial courts. The template could, at the earliest, be completed by November, but would more likely be done in December. Judge David Estudillo of Grant County recently joined the work group to serve as co-chair along with Fona Sugg.

2016 Commission Meeting Dates

The Commission reviewed the proposed dates in the schedule for Interpreter Commission meetings in 2016. They discussed potential sites for hosting a public forum in May of 2016. Mr. Lichtenberg suggested looking at data from the court reimbursement program to help locate a region where courts are having trouble meeting their interpreting needs locally. The Commission discussed counties on the Olympic Peninsula, counties north of King County, and counties eastern Washington.

The Commission also discussed language access issues involving police in areas around the state. It was suggested that, although the Commission's work was focused on language access in the courts, issues in other related areas such as law enforcement could be addressed if those issues are tied to how they impact the courts.

The Commission decided to explore Skagit County as the location for the next public forum. The Commission cited that its location in relation to other counties and the particular issues facing the courts there make it a good spot to hear about important issues from the public. Ms. Farley offered to help locate people or groups in the area that would be interested in attending the forum.

The Commission also discussed how 6 months before the end of a Commission member's term, the process to find a replacement for the Commission member should be started to help have a smooth transition. Two members will come to their 6-year term limit (two terms) in September of 2016.

COMMITTEE REPORTS

Issues Committee Report

Proposed CEU Requirements

Judge Beall began her report on the recent activities of the Issues Committee with a discussion of conflicts between Title VI of the Civil Rights Act and RCW 2.43. She

explained that the Committee's discussion brought up a lot of questions and that they are continuing to gather information. In the meantime, the Committee discussed several other pressing topics over the summer.

The Committee discussed how the AOC and the Commission should process grievances. They hoped to find a way to work with grievances without making new policies or rules. One important area was how people could express their grievances to the Commission. The Committee was considering creating two forms: one for grievances regarding interpreter performance or conduct, and another form for grievances about interpreter services. This led to a discussion about what the AOC or Commission could do to address complaints or concerns brought up about a court. This topic is still part of an ongoing conversation.

The Issues Committee also discussed the proposed changes to Continuing Education Units (CEU) policy. The changes included adding a third category for credits and increasing the number of required credits for registered interpreters to match the number required for certified. The proposed changes were sent out to credentialed interpreters for comment. The Committee did receive some feedback, although not as much as they would have liked.

There was some anxiety about the changes on the part of interpreters. One concern was the availability of classes to meet the new categories. The Committee felt that agencies will adapt to the changes. The AOC can also make a concerted effort to work with agencies to provide courses that meet the requirements.

The issue of raising the number of required credits for registered interpreters was more difficult. The difference between certified and registered interpreters is based on what language an interpreter speaks and not the interpreter's level of skill. However, the pay rate is frequently lower for registered interpreters and there is less opportunity for work. Also there is less chance of language specific classes. Given the more contentious nature of this change the Issues Committee wanted to bring the discussion back to the Commission for further discussion.

Mr. Mattix mentioned that he had never seen a language-specific class for the two languages he is credentialed in and didn't see that as much of a barrier. Judge Beall agreed, but mentioned that some interpreters did have that impression. Mr. Lichtenberg mentioned that if the Interpreter Program can outreach to the CEU provider community and explain what is needed, the providers will come up with language-specific solutions.

Ms. Sugg asked about pay and whether the actual pay rate was lower or if it was just a matter of fewer assignments. Judge Beall answered that both were the case and that some courts have different pay scales for registered and certified interpreters. Less work makes interpreting a less sustainable profession so there was a concern that by increasing the requirements, it may discourage people from pursuing interpreting. Ms. Sugg mentioned that her court pays the same for both certified and registered interpreters. Mr. Mattix noted that the only court he has seen a difference in is Seattle

Municipal and the difference is of five dollars. AOC staff reported that the same has been seen in King County Superior courts.

Ms. Jennings mentioned that she was impressed with a letter from an interpreter who is also a lawyer who mentioned it is a 62% difference in number credit hours required. However, for administrative purposes, having uniformity in the number of credits would be better.

A few members of the Commission pointed out that by creating the additional education track category, the scope for what qualifies as an approved course is broadened and so by expanding what would qualify for credit mitigates some of the concern about there not being enough courses in each education category. But there were still concerns about the change causing people to leave the profession.

In regards to the availability of classes and cost, Mr. Mattix gave the example of the upcoming Washington State Coalition for Language Access (WASCLA) conference. This annual conference would qualify for almost half a reporting cycle's worth of credits for an affordable amount of money and time. Mr. Lichtenberg mentioned that some of the registered interpreters that had responded were also attorneys. The Commission discussed how courses that count towards fulfilling an attorney's Continuing Legal Education (CLE) requirements can also count towards their interpreter continuing education requirements if appropriate. Ms. Jennings mentioned that many CLEs are open to non-attorneys and that many of them may qualify for credit under the new changes to CEU categories.

Decision: The Commission agreed that the number of credits required for registered interpreters should be raised to 16. The new policy will go into effect for the 2016-2017 cycle.

Members of the Commission suggested that when announcing the policy, it should be mentioned that the Commission discussed different sources of CEUs and how more classes will now qualify under the new categories. Webinars, including some done in previous years, are also available for credit. Study groups are also options that wouldn't require much money. AOC staff mentioned that classes that have been approved for credit appear on the Court Interpreter Program website.

A member of the Commission mentioned that one concern that was brought up from an interpreter is that ethics classes given in other states may not be available for credit in Washington since they don't address the Washington Code of Conduct in particular. However, the discussion revealed that there have been non-Code ethics classes and webinars that have been approved for credit by the AOC. Webinars that are available indefinitely are available on the website, however, the providers must make the AOC aware that their webinars are still available.

Ms. Jennings brought up the topic of possible redundancy in policy between certified and registered interpreters now that they have the same CEU requirements. Judge

Beall mentioned that while there is redundancy, the two categories have separate policy manuals for a different reason, so it would be better to maintain separate language.

ODHH ASL Interpreters as “AOC certified”

Judge Beal discussed the request from the Office of the Deaf and Hard of Hearing (ODHH) for the AOC to recognize some ASL interpreters as “certified”. Some of that discussion involved what the policy language would look like if the request was granted. Although the request seemed simple, the ensuing committee discussion revealed a very complex topic with potential unintended consequences. One of the potential unintended consequences could be an effect on rate of pay. There was a concern that if ASL interpreters were to take the label of “certified” then courts may start paying them the same generally lower rate now being paid to AOC-certified spoken language interpreters.

Another important issue discussed by the committee was how the disciplinary process the Commission has in place now would operate for ASL interpreters. Currently the ODHH does not have a disciplinary process and it was expected that the AOC would take on that role under GR 11.2. There are concerns about the differences in investigating an ethical violation alleging the inaccuracy of an ASL interpretation and one given in a spoken language. For spoken languages, the audio of the interpretation is on the record, but for ASL there rarely is video evidence. Therefore, there would be some limitations in the kinds of allegations that could be investigated. However, it was pointed out that spoken language interpretation isn’t always intelligible as sometimes they cannot be heard on the record.

Ms. Ross clarified that currently the ASL interpreters are certified through the Registry of Interpreters for the Deaf (RID), which does have a grievance process for dealing with violations to the RID code of ethics. This wouldn’t include grievances related to the Washington State Code of Conduct. Therefore, it would be better to have a grievance process that relates to that Code of Conduct and have that process handled through the AOC and Interpreter Commission.

Ms. Ross gave an example of a grievance from a court in northern Washington where a deaf litigant had an interpreter and the interpreter refused to interpret other cases that were going on in the court while the litigant was waiting for his or her proceeding to begin. It was noted that in this case the ASL interpreter was behaving in the ethical manner that spoken language interpreters are expected to behave, i.e., spoken language interpreters are not supposed to interact with the litigant outside of litigant’s proceeding. This is a change to how ASL interpreters have acted in the past and is a result of court ASL interpreters learning about the WA Court Interpreter Code of Conduct prior to being “certified” by ODHH.

This brought up the question of whether the deaf person would need a separate interpreter for “observer” access and whether the Commission would have jurisdiction of that kind of interpreter since the interpreter would have to be provided by the court to a

qualifying party. Given the discussed complications, the Issues Committee brought the topic back to the Commission for further discussion. Judge Beall recommended that the Commission grant the ODHH request for the Commission to handle the discipline process for ASL interpreters.

The Commission discussed the likelihood of the pay for ASL interpreter being reduced. Some members didn't see a reason for courts to reduce pay. Ms. Ross mentioned that some courts already pay ASL interpreters the same amount as spoken language interpreters while others pay the rates pursuant to the state master ASL contract managed by ODHH. There is a concern that the Commission's decision could influence the Interpreters Union pay negotiations with the State in the future. The Health Care Authority (HCA) has tried to pay ASL interpreter the same as spoken language and, as a result, had difficulty obtaining ASL interpreters. It was felt that small courts don't have the same ability to negotiate as larger courts and often pay what they have to in order to provide an interpreter at all. It was reiterated that Commission doesn't have authority to tell courts what they must pay and can only make suggestions.

Ms. Sugg asked for clarification about what courts in the AOC's reimbursement program pay interpreters. AOC staff stated that courts in the program receive 50% of what they pay for an interpreting assignment, up to a maximum reimbursement of \$25 per hour.

Ms. Ross mentioned that since only 14 interpreters in Washington have passed Specialist Certificate: Legal (SC:L) certification, the group that would qualify for reimbursement was expanded to include interpreters who passed the written section of the SC:L. There was a concern that interpreters with generalist certification might claim that they are certified. To mitigate this risk, interpreters who do qualify under ODHH's program rules receive a court interpreter identification badge.

Mr. Lichtenberg pointed out that RCW 2.42 says that courts shall appoint an interpreter on an ODHH list. Up until now, that list hasn't existed.

It was pointed out that courts currently have choice of 365 ASL interpreters that they can use. But if the Commission deems the ODHH interpreters as certified, they will be cutting down the number of ASL interpreters drastically. If none of those interpreters on the list are available, however, the court can qualify another interpreter not on the list. Courts would more likely get a better qualified interpreter when one is available if they have the list. But courts still have the option of qualifying an interpreter not on the list if needed. The hope is to focus courts on using the ODHH list and possibly drive more ASL interpreters to get certified.

One concern that was brought up was that the RID has suspended the performance portion of all of their tests. So the 9 ASL interpreters who have passed only the written portion of the SC:L will not be able to take the performance portion of the test for the indefinite future.

AOC staff clarified that courts up until now have been reimbursed for any ASL interpreter. However, the contracts for this fiscal year say that courts will only be reimbursed for ASL interpreters on the ODHHS list.

Given the complexity of the issue and need for further discussion, it was decided to table the issue until the next meeting.

Final Revision to GR11.1

Judge Beall explained that General Rule (GR) 11 currently only gives the Commission oversight of certified interpreters. However, GR 11 doesn't include language referring to registered interpreters. To eliminate this confusion, the Committee suggested changing the language in GR11 to include the term "credentialed" which would include both certified and registered interpreters. It was clarified that if the ASL interpreter were to be deemed "certified" by the AOC, they would fall under this credentialed category.

Decision: The Commission agreed to adopt a language change in GR 11 to include the term "credentialed."

Education Committee Report

"Inactive" and "Unavailable" Status

Mr. Mattix discussed the proposal for inactive status. The proposed policy was amended to address some of the previous causes of concern. The Commission discussed whether or not AOC needs to review a reason given by an interpreter for his or her inactive status request. Some members felt the AOC may not need to be discretionary about granting the inactive status. There was also a concern about the number of credits that would be required from interpreters when they return to active status. It was felt that the policy should be clear about what was expected when interpreters return to active status.

AOC staff brought up the concern about an AOC-credentialed interpreter working in courts while on inactive status. It was felt the Commission could not prevent a court from qualifying an interpreter if they wanted to use them. This could be mitigated by the AOC making it known to courts when an interpreter goes on inactive status.

The Commission decided to adopt the recommendation to create an inactive status with some modifications (see Appendix for text of the policy amendment). The policy should drop the elements regarding discretion of AOC staff in approving an interpreter going on inactive status. Also, the interpreter will be expected to make up the full number CEUs that he or she missed before going back on active status.

Decision: The Interpreter Commission unanimously passed the Inactive Status proposal as amended during the meeting.

Mr. Mattix went on to discuss a request brought to them throughout the state for training for people responsible for scheduling interpreter. The Education Committee approved of this training as well as having a presentation at the Spring Conference for the 2016 District and Municipal Court Judges' Association.

COURT INTERPRETER PROGRAM UPDATE

Language Access Plan Workgroup

Ms. Sugg described the current status of the LAP workgroup. Currently the work group is divided into two groups: One group is working on the template and another group is working on other material that accompanies the current template. The workgroup has had one large meeting will have a second subcommittee meeting following the Interpreter Commission meeting. Another meeting is planned for the following week to introduce the new co-chair, Judge Estudillo.

Commissions Manager Update

AOC staff updated the Commission on the current search for the Supreme Courts Commissions Manager. Cynthia Delostrinos has been acting as a lead for the group while the search for a manager continued. The next round of interviews was expected to happen soon and Justice González will be taking part in those interviews.

Budget and Workplan for Interpreter Program

The Commission reviewed the materials in the packet relating to the budget and work plan for the Interpreter Program in 2016. AOC staff noted that one of the differences from recent years is a greater investment in training and preparation for the interpreter written and oral exams. These activities will be more of a focus for the Program in 2016 than they have in the past. Another focus for the upcoming year will be training the court staff who work directly with interpreters. AOC staff also asked the Commission for any further ideas, in particular topics relating to judicial training that haven't been covered in the past. The Commission also reviewed a sample agenda for a proposed Court Interpreter Coordinator conference that was created by the Commission a few years ago.

Justice González suggested that more sophisticated training be provided to judicial officers regarding sign language interpreters and other kinds of interpreters for the Deaf and Hard of Hearing. This would include the kinds of technology that can be used.

Judge Beall mentioned that she had recently been contacted by a member of the Rules Committee for the DMCJA. They are looking at court rules involving interpreters including difficulties in acquiring them and also about how video remote interpreting may be addressed in court rules.

NEXT MEETING

The next meeting will take place on December 4, 2015.

Decisions:

The number of credits required for registered interpreters will be raised from 10 to 16. The new policy will go into effect for the 2016-2017 cycle.
The Commission adopted a language change in GR 11 to include the term “credentialed.”
The Interpreter Commission unanimously passed the Inactive Status proposal as amended during the meeting.

Action Items:

<i>Issues Committee</i> - Continue discussion on how to approach the disagreement between RCW 2.43 and Title VI requirements.	Ongoing
<i>Issues Committee</i> - Discuss how the Interpreter program can work with the ODHH to avoid duplication or tension when providing technical assistance about the ADA. A referral process should be developed if something comes in that is beyond what the AOC can provide.	Ongoing
<i>Ms. Farley</i> – Create and circulate a list of entities that should receive copies of letters addressed to court administrators.	Future Action
<i>Ms. Farley</i> - Assist the AOC in locating resources for public forum in Skagit County	Future Action
<i>AOC Staff</i> - Send out contact information sheet for Commission members to update	Completed
<i>AOC Staff</i> - Fix spelling in previous minutes.	Completed
<i>AOC Staff</i> - Consider more sophisticated training at the judicial college on the topic of working with the Deaf and Hard of Hearing, including the different kinds of interpreters that are used and the technology that can be used.	Completed
<i>AOC Staff</i> - Six months before the end of Commission members’ term, begin looking for their successors.	Future Action
<i>AOC Staff</i> - Put the topic of “certifying” ODHH interpreters on the agenda for the December 4 meeting.	Future Action
<i>AOC Staff</i> – Provide Commission members with the terms of what kinds of events the Interpreter Program reimburses for and what the reimbursement looks like.	Future Action
<i>AOC Staff</i> – Work with outside agencies, including the Bar Association, about having courses approved for CEUs	Future Action
<i>AOC Staff</i> - Draft a letter from the Commission to the Yakima court to find out who their ADA contact person is.	Future
<i>AOC Staff</i> – Update online Interpreter policy manual with “Inactive Status” policy amendment as approved by Commission.	Future

Appendix

FULL TEXT OF INACTIVE STATUS POLICY AMENDMENT

Inactive Status

- A. Interpreters may ask the AOC Interpreter Program to place them on “Inactive Status” without losing their certification or registration after the completion of no less than one two-year compliance cycle, during which period they shall not work as AOC-credentialed interpreters in Washington State courts. The period of inactivity is limited to five years. Interpreters who do not return to active status within five years will automatically lose their certification or registration credential. Requests for inactive status must be submitted in writing to the AOC Interpreter Program. The AOC Interpreter Program will provide written confirmation of requested status to the interpreter within 10 business days.
- B. Only interpreters in good standing with the AOC Interpreter Program are eligible for inactive status. An interpreter is considered in good standing if s/he (1) has not had his or her certification or registration revoked; (2) has satisfied all continuing education, certification/registration, and/or certification/registration renewal requirements for the previous compliance period; and (3) has satisfied all other AOC Interpreter Program requirements.
- C. The Master List will reflect that the interpreter is on inactive status.
- D. An interpreter who wishes to return to active status must submit a written request to the AOC Interpreter Program. The interpreter must also complete compliance requirements for continuing education and courtroom interpreting assignment hours for the period of inactive status.