

I am a VRS interpreter with over twenty five years community experience, and have been a VRS interpreter since March 2008. I have been RID certified since 1987. I will not pretend to know all of the details that affect compensation, so I will not speak to it specifically. Instead, I will speak to what I am able: the need for qualified interpreters in VRS settings, and how that impacts funding decisions.

Deaf and hard of hearing persons have a right to functional equivalency regarding telephone communication access. This access can only be equivalent when the interpreter has not only adequate preparation and found to be competent through an independent testing system, but must also has sufficient experience to develop the discernment needed to quickly navigate the innumerable possible scenarios. Interpreting means providing communication between 2 or more people, and as people do not come in black and white molds, each scenario must be navigated anew. The more experience you have, the more practice you have at making those critical instantaneous judgment calls on how to recreate the message in another language. Interpreters who take work in the community are at liberty to turn down assignments based on their ability to be effective due to a lack of experience in the specific area. In VRS, we do not have the luxury of screening calls and rejecting them for this reason. Nor can we refuse a call because our personal experience may bias the interpretation. The ability to remain neutral is strengthened over time. In short, highly qualified interpreters have not only appropriate training and proof of competency, but also sufficient experience in the field. These are the three areas that must be regarded when determining who is highly skilled.

Because the cost of interpreters is the single largest expense in any VRS industry, I believe that all VRS providers must be compelled to detail the actual cost of interpreting (wages and benefits) as a separate item in their operating budgets. This will help the administrators of the TRS funds to see how to better allocate funds. Whatever funding system is implemented, it must be found to be viable based on the compensation of highly qualified interpreters, independent of other funding sources.

I also strongly believe that the funds must be allocated in a way that supports the continued provision of the most highly qualified interpreters, so that the customers are best served. This must be the first consideration. While the prevention and detection of fraud is always important, I think that all forms of fund distribution are open to the possibility of fraud, and that it behooves the industry to put the needs of consumers first, and to secondly develop fraud prevention and detection policies that respond to whatever system is developed that best meets the need. I think that it would be a mistake to create a compensation system based primarily on fraud prevention, in the hopes that companies can somehow work in the provision of highly qualified interpreters. Without highly qualified interpreters, the ability to provide functional equivalence to the access the general public has is compromised, and is directly counterproductive to the purpose of the TRS funds.

Respectfully submitted,

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