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**Notes:**
- Agency Determination is necessary without substantive public interest and should remain in effect without further action.
- No comments with merit.
- Keep in Code and Update History Note.
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**G.S. 150B-21.3A Report for 21 NCAC 25, INTERPRETER AND TRANSLITERATOR BOARD**

**Keep in Code - Update History Note**
December 6, 2016

Paul Gillispie
4830 Wilgrove-Mint Hill Rd
Charlotte, NC 28227

Re: Public Comment

Mr. Gillispie:

Thank you for submitting a public comment. Your concern is duly noted, and considered by the Board. The Board will gather more public input to later determine a potential amendment to this rule.

Yours very truly,

Caitlin Schwab
NCITLB Administrator
December 6, 2016

Martha L. H. Ingel  
9124 Castle Gardens Lane  
Charlotte, NC 28215  

Re: Public Comment  

Ms. Ingel:  

Thank you for submitting a public comment. Your concern is duly noted, and considered by the Board. The Board will gather more public input to later determine a potential amendment to this rule.

Yours very truly,  

[Signature]  
Caitlin Schwab  
NCITLB Administrator
December 6, 2016

Jamie Marshall Staley
5637 Marblestone Drive
Granite Falls, NC 28630

Re: Public Comment

Ms. Marshall Staley:

Thank you for submitting a public comment. Your comments were duly noted and considered by the Board. We are researching your suggestions currently.

Yours very truly,

[Signature]

Caitlin Schwab
NCITLB Administrator
December 6, 2016

Craig Blevins
C/O NCAD
P.O Box 1385
Cary, NC 27512-1385

Re: Public Comment

Mr. Blevins:

Thank you for submitting a public comment. Your comments were duly noted and considered by the Board. We are researching your suggestions currently.

Yours very truly,

Caitlin Schwab
NCITLB Administrator
To: Bethany Hamm-Whitfield, Chair,

I plan to attend NCITLB board meeting on Friday, November 18th. I would like to make comments and have 4 suggestions. Please let me know if I can be on agenda on Friday, November 18th.

Here is NCAD’s suggestions to the NCITLB were:

1) would love the idea of mandating all Licensed Interpreters to add information on how to file a complaint on the back of their business cards along with their License #. It should also be a mandatory that Interpreters are to submit their business card to every client they serve.

2) there is no information in their website on what tests Interpreters took (NIC, EIPA level, SC:L, et cetera). That information should be available.

3) Interpreters need to be CATEGORIZED on their website. Ex: Educational Interpreters only, RID certified Interpreters only, Legal Interpreters only.

Because courts use EIPA interpreters in the court rooms! It did happened! Clerks looked up NCITLB website and automatically think all interpreters are qualified. There are NO "categories" in NCITLB website.

4) Violations should be shared with the public (posted on their website). RID EVEN publishes violations in their quarterly magazine, the VIEW.

Thank you,
Craig Blevins, President
North Carolina Associations of the Deaf
Hi,

I saw an email from your office, asking for "public comments regarding rule objections."

While I have trouble reading lengthy pages of "rules" I do have some comments.

1) Almost ALL Deaf clients are clueless to where and how they can file a complaint.

I strongly recommend these all licensed Interpreters add information on how to file a complaint on the back of their business cards along with their License #.

It should be required that Interpreters are to submit their business card to every client they serve.

2) There is no information in NCITLB's website on what tests Interpreters took (NIC, EIPA level, SC:L, et cetera). That information must be made available.

3) Interpreters need to be CATEGORIZED on NCITLB's website. Examples: Educational Interpreters only, RID certified Interpreters only, Legal Interpreters only.

Because there are EIPA interpreters interpreting in the court rooms! Clerks looked up NCITLB website and automatically think all interpreters are qualified and hold CS:Legal. There are NO "Interpreter categories" in the NCITLB website.

4) Violations should be shared with the public (posted on the website). RID EVEN publishes violations in their quarterly magazine, the VIEW. And that is on a national level! NC RID needs to do the same.

Jaime Marshall Staley
Regarding section .05000 – Continuing Education
21 NCAC 25.0501 Continuing Education Requirements (a)

It is recommended that the NCITLB strike the second half of the second sentence as shown below:

**21 NCAC 25 .0501 CONTINUING EDUCATION REQUIREMENTS**

(a) A licensee shall earn at least two continuing education units ("CEUs") each licensure year. At least 1.0 of those CEUs shall be earned in professional studies and at least 1.0 of those CEUs shall be earned in a setting in which three or more persons come together at the same location at the same time as a group to listen to a lecture, to view a demonstration, to participate in group discussions, or to learn through any combination of these or similar activities.

**Rationale:**

In 2016, online learning has become a highly effective means of learning and professional development. Online delivery of pedagogy has come a long way since the implementation of licensure and many online programs offer the opportunity for virtual networking and participant interaction via webcams and other technology. For example, it is possible to network and interact virtually face to face with interpreters from all over the globe in virtual learning formats such as FUZE, Go To Meeting, etc. Because of limited numbers of attendees in various regions, a significant amount of high quality, advanced interpreting pedagogy is delivered through online means and applications including specialty legal interpreting and medical interpreting workshops. It is now possible to obtain a Master's degree in Interpreting through online instruction at a variety of high quality accredited institutions. Requiring in-person attendance for education is not a reasonable way to foster interaction amongst attendees. It is possible for interpreters to attend in-person trainings and not speak to or sign with anyone. Requiring face to face attendance directly assumes that professional interpreters will not interact with colleagues without being required to do so as a condition for licensure maintenance. RID does not have an in-person requirement for their certification renewal. Many interpreters have had to forego better training programs than those offered in-person because of the requirement that at least 10 hours (1 CEU) be conducted in a setting in which three or more persons come together at the same location. It seems reasonable to allow regulated practitioners the professional autonomy to determine which setting will best serve their ongoing professional development, time availability, and learning style.
Regarding section .05000 – Continuing Education
21 NCAC 25.0501 Continuing Education Requirements (a)

It is recommended that the NCITLB strike the second half of the second sentence as shown below:

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Rationale:
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Paul M Gillispie, BBA, CI/CT, SC:L, NIC:Master, NAD, NCITLB License #2005346
Private Practice Interpreter