

Friday, October 13, 2023

**Natalya Mytareva, CCHI**

**Re: Comments for Options Poll**

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**I support the option of “State Certified Office Contracts with National Medical Interpreter Certifying Bodies.”**

**These are my top 3 reasons from the profession’s and public’s perspective:**

- **Validity, reliability, and integrity of national certification programs.** National certification exams are validated through a comprehensive multi-step process based on the input from all stakeholders via a national Job Task Analysis survey (see the latest at [https://cchicertification.org/uploads/CCHI\\_Job\\_Analysis\\_Report\\_2022.pdf](https://cchicertification.org/uploads/CCHI_Job_Analysis_Report_2022.pdf)) and multiple panels of subject matter experts, who are practicing interpreters. These exams are monitored by psychometricians and regularly updated. For example, CCHI conducts national job task analyses every 6-7 years, and updates the structure of its exams accordingly, and in addition, the content (specific questions) are updated every 2 years. National certification exams for interpreters meet the same parameters for certification as certification exams for other professions, such as physicians, nurses, other allied health professions, lawyers, accountants, etc. Certificants of these professions have completed college coursework yet their certification exams are created and administered by certifying entities outside of educational institutions for two main reasons: avoidance of the conflict of interest and ensuring the content directly reflects the current practice (and not educational constructs).
- **Multiple paths to certification.** National certification eligibility requirements are also validated through a regular national survey as meaningful, equitable, and acceptable to all stakeholders. The educational requirements are intended to provide broad access to the profession in a timely manner, while the exams assess candidates’ competency. These requirements allow immigrants and refugees an opportunity to enter the profession in a short time without adding an additional burden of completing a college course or acquiring a college degree. (Currently, CCHI’s eligibility requirements are a high-school level of general education, 40 hours of medical interpreter training, language proficiency in English and the Language Other Than English, and being 18 years of age. See the rationales at <https://cchicertification.org/eligibility-rationale/>).
- **Stability, transparency, and accountability.** CCHI is the only national entity certifying interpreters that has its main certification programs (CoreCHI and CHI-Spanish) accredited by the National Commission for Certifying Agencies (<https://www.credentialingexcellence.org/Accreditation/Earn-Accreditation/NCCA>). This accreditation ensures that CCHI meets all the requirements for accreditation in the areas of the organization governance, finances, psychometric parameters of the exams, communication with candidates and certificants. NCCA monitors compliance through annual reports and a reaccreditation process every 5 years. I must say that non-accredited certifying entities or private businesses offering testing (“third-party vendors”) may not provide a similar level of assurance regarding stability and accountability as CCHI does, because they do not have any oversight.

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That said, another reason is an opportunity for the state DSHS to focus on the areas that would contribute to workforce development in the important areas of:

- Providing affordable educational opportunities both to prepare for certification and for continuing education – this would be a great opportunity to support local community colleges and organizations
- Subsidizing the cost of certification exams and certification maintenance by offering scholarships and creating grants for specific populations.
- Monitoring professional performance through disciplinary oversight.