

On the Road with GAP!

Janet L. Bailey, CSC, NIC Master, SC:PA,
RID Government Affairs Representative

The RID Government Affairs Program (GAP) traveled the country this past summer and provided updates at each regional conference. Despite record-breaking heat and summer storms, GAP Representative Janet Bailey made it to four of the five conferences. A thunderstorm kept her from the Region II Conference in Chattanooga, TN. However, thanks to President Cheryl Moose, the GAP report was presented! The interactive update sessions evolved throughout the tour; meaning that Region V heard GAP news first, but Region I heard the latest information. Because of the evolution of this fast-changing program and for those who were unable to attend, I offer the summarized GAP highlights:

Federal Communications Commission (FCC): RID's GAP strategy includes becoming involved in the national dialogue on video relay service (VRS). We have familiarized ourselves with the issues, gathered information from our members working in this setting and established an association position. In April, we shared the basic tenets of this position with the new FCC leaders. They were very receptive to RID's involvement and encouraged us to share the organization's perspectives and offer concrete recommendations.

Since that meeting, RID has posted filings from our meeting and each of the pertinent rulings or inquiries set forth from the FCC. RID has also filed comments in support of positions supported by other groups. We have received questions as to why we have not responded to consumer issues or to provider concerns for rate setting. The reason being is that RID's goal is to bring a clear and articulate *interpreter voice* to the discussions. As such, we support other groups in their perspectives, but our comments must focus on interpreter issues.

FCC NOTICE OF INQUIRY re: the Structure and Practices of the Video Relay Service Program. [CG Docket No. 10-51]: RID's comments submitted on August 18, 2010, focused only on those items that have a direct bearing on our members, the nation's professional interpreters working as communication assistants (CAs) in the VRS system.

Thanks to the members who contacted us in record numbers, offering first-hand perspectives and experiences. We used these responses to shape a strong message requesting that the FCC:

- Protect the quality of VRS in striving to meet the definition set forth by the Americans with Disabilities Act of qualified interpreter by establishing minimum standards for hiring nationally certified interpreters as CAs;
- Expand functionality for all deaf and hard of hearing consumers by requiring VRS providers to expand their services to meet the communication needs of all deaf, hard of

hearing, late deafened and deaf-blind consumers utilizing the skills and experience of the interpreter workforce;

- Recognize that interpreters provide the core service of VRS and understand that the lessons the profession has learned in its 50 year history, by providing services to the Deaf and hard of hearing communities, can benefit VRS efficiencies and expand functionality for consumers;
- Mandate technical improvements to VRS so that providers have the ability to route callers to interpreters who can meet their specific needs and preferences. The current CA workforce has the diverse skills needed; it requires ONLY the technical implementation. This would enable the FCC and the VRS industry to increase their consumer base, potential minutes and meet a need that has heretofore gone unmet; and
- Assure a healthy and safe work environment for interpreters.

DHHCAN (Deaf and Hard of Hearing Consumer Advocacy Network) and DHHA (Deaf and hard of Hearing Alliance):

In order to support the Deaf and hard of hearing community, RID has long been involved with consumer groups. GAP has allowed RID a consistent presence at these meetings, where we have benefited from working with consumer colleagues and joining their workgroups. Interpreters have always stood next to the Deaf community; supporting their goals. We share a common thread—effective communication access. This type of collaboration is key to RID's continued involvement in community events and governmental affairs. Supporting one another's organizational goals is a wonderful way to assure that we are all stronger.

National Emergency Numbering Association (NENA)/

Accessibility Committee: This is another group that RID has worked with for years. Working with Richard Ray (CA), Committee Chair, and Donna Platt (WA), Vice Chair, has been a wonderful way to voice the interpreter perspective— and a huge learning experience.

NENA calls themselves *The Voice of 9-1-1™*. They work with 9-1-1 professionals across the country. They establish standards and operating guidelines for the Public-safety Answering Points (PSAPs), or 9-1-1 Centers. The Accessibility Committee is assisting in an update of their "NENA Video Relay Service & IP Relay Service PSAP Interaction Operations Information Document (OID)."

This work is very important for the overall success of deaf and hard of hearing access to the 9-1-1 system. In doing this work, GAP has reached out to members, industry partners and



PSAP personnel. In June, GAP was asked to participate in a panel discussion for the NENA conference. During this session, Richard Ray and Donna Platt presented a live demonstration using both IP and VRS to make emergency calls. Both proved to take over five minutes to connect to the PSAP. It is clear to all who participated that we have a long way to go to achieve functional equivalence for deaf and hard of hearing persons making emergency calls.

The RID presentation listed current challenges (gathered from RID members working in VRS settings) and a list of recommendations:

- Current VRS strategies have defaulted to sharing E911 call responsibilities among the entire employee base; there is no 'emergency call team' that has specific experience, credentials or training.
- There is a concern that some interpreters do not have the skill or the experience to handle the interpretation appropriately. There are now many new interpreters who never worked in the related community settings (medical, legal, emergency) and have a limited understanding of the various situations that arise.
- Interpreters have shared with RID their fear and hesitancy about accepting emergency calls. They are unsure and less than confident.
- Training is sparse, based on corporate procedures, and insufficient to assure a confident and capable workforce able and ready to provide the communication access necessary.
- Interpreters are conflicted when it comes to being "wires" or "dial tones" and providing a transparent service when emergencies require involvement and responsibility.
- Job stressors are not being supported by employee assistance programs (EAP); support protocols (teaming, breaks, outcomes); and there needs to be more counseling support available.

RID RECOMMENDATIONS, including minimum standards for E911 Interpreters (credentials, experience and training): introductory and on-going training (equal to PSAP training), consumer education to provide clarity and understanding and interpreter support (EAP counseling, teaming, breaks). But more than these 'fixes,' we recommended that the system should be separated from VRS guidelines with special rules or exceptions to support this very special emergency setting:

1. Only trained and experienced interpreters receive calls;
2. Consistent interpreters; as an exception, the first interpreter should, as often as possible, stay with the consumer throughout the call, and if a call is dropped, that interpreter should be re-connected to save time and provide a more successful experience.
3. Video remote interpreting allowed, as an exception, to enable interpreters to continue to interpret work until such time as a covered entity (hospital, police station) takes over and provides interpreting services under other legislative mandates.
4. Interpreters allowed to serve as facilitator of commu-

nication as an exception to assist in the timely connection to the PSAP and ultimate help.

As a result of these exceptions, we recommend that the FCC establish special guidelines that will outline the rules and regulations and offer protections for the personnel providing these services.

State Law Clearinghouse: We now have information from eleven states on the status of their state interpreter laws. We are looking to develop a Web based format for the information we receive, so we need you to send us your state's information.

*Get involved, Stay involved!
It's working – They're listening!* ■



We need you! RID is currently researching best practices for VRS occupational safety in the areas of utilization and occupancy rates. If you have recommendations, please send them to us at govtaffairs@rid.org.



Janet L. Bailey, CSC, NIC Master, SC:PA, is RID's first Government Affairs Representative.