



**OKLAHOMA
Rehabilitation Services**

Executive Services

February 20, 2024

RE: Oklahoma Department of Rehabilitation Services Administrative Rules

To Whom It May Concern:

Thank you for your participation in the Oklahoma Department of Rehabilitation Services (DRS) Administrative Rules proposed changes process for 2024. DRS wants to ensure that the needs and wants of both the Deaf Community and the Interpreting Profession are met through the ICRC responsibilities.

Many comments were received during this process, showing conflicting opinion in relation to DRS policy 612:10-13-20 (b) Continuing education requirements. With that acknowledgement, it was decided to remove that section from the 2024 changes with the intent of working with stakeholders to further develop this policy to be included in the 2025 Administrative Rules cycle.

The current language will stand at this time.

(b) Continuing education requirements. QAST certified interpreters are required to satisfy one (10 hours) Continuing Education Unit (CEU) annually, with .1 (1 hour) of this in the category of Ethics. It is the interpreter's responsibility to ensure all supportive CEU documentation is submitted to the Interpreter Certification Resource Center (ICRC) staff before or on December 31st, to avoid certification becoming invalid. If certification becomes invalid, the individual must apply to test, and will be required to take and pass the written ICRC/QAST test before becoming eligible for the performance portion.

DRS operates with the understanding that ICRC serves as the Oklahoma credentialing agent for the interpreting profession. The goal is to support the Deaf community and the interpreting service providers by upholding high standards to obtain and maintain an Oklahoma Interpreting Certification.

With that in mind, the issue of increasing the CEU requirement to 20 hours has strong support from all entities. Not only will this increase better align RID ideology with ICRC Code of Professional Conduct, but it will also recognize the needs and requests from the Deaf Community. How we phase into this requirement with the least disruption to our interpreters and statewide services and the highest benefit to our Deaf community is the issue that must be discussed and established going forward.

DRS Administration and ICRC Staff are dedicated to working with all stakeholders as we develop the best plan for elevating the professional responsibilities of interpreters and respecting the appeals of the Deaf Community in wanting a better trained service provider.

We look forward to new pathways to a better service network for the Deaf Community in the state of Oklahoma.

Sincerely,

A handwritten signature in black ink that reads "Melinda Fruendt". The signature is written in a cursive style with a large initial "M".

Melinda Fruendt, DRS Director

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