



**KING COUNTY**

1200 King County Courthouse  
516 Third Avenue  
Seattle, WA 98104

**Signature Report**

**September 8, 2014**

**Motion 14223**

**Proposed No. 2014-0276.1**

**Sponsors McDermott**

1           A MOTION acknowledging receipt of a report regarding  
2           the costs and service delivery methods of interpreter  
3           services within King County, as well as the pros and cons  
4           of developing a consolidated system for the provision of  
5           interpreter services countywide and recommendations for  
6           improvements to the current system for the provision of  
7           interpreter services, in compliance with the 2014 Annual  
8           Budget Ordinance, Ordinance 17695, Section 18, Proviso  
9           P5.

10           WHEREAS, the 2014 Annual Budget Ordinance, Ordinance 17695, Section 18,  
11           Proviso P5, requires the executive to transmit a motion and report regarding the provision  
12           of interpreter services by June 30, 2014, and

13           WHEREAS, the report includes the actual costs of providing interpreter services  
14           between 2010 and 2013, and

15           WHEREAS, the report discusses the utilization of interpreter services by county  
16           agencies, including how users of the service are identified and how interpreters are  
17           assigned, and

18 WHEREAS, the report provides an examination of the service delivery  
19 methodology used, including quality control and how conflicts are identified and  
20 addressed, including the possible use of technology, and

21 WHEREAS, the report provides an examination of the pros and cons for  
22 developing a consolidated system for the provision of interpreter services countywide,  
23 and

24 WHEREAS, the report includes recommendations for improvements or changes  
25 to the current system for the provision of interpreter services;

26 NOW, THEREFORE, BE IT MOVED by the Council of King County:

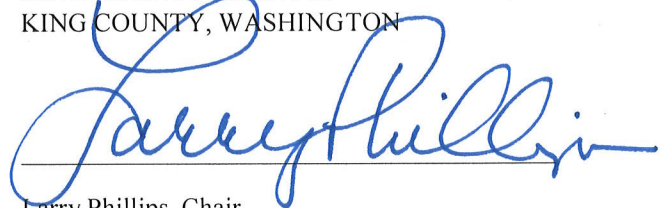
27 The report relating to the provision of interpreter services in King County in

28 compliance with the 2014 Annual Budget Ordinance, Ordinance 17695, Section 18,  
29 Proviso P5, which is Attachment A to this motion, is hereby acknowledged.  
30

Motion 14223 was introduced on 7/21/2014 and passed by the Metropolitan King  
County Council on 9/15/2014, by the following vote:

Yes: 8 – Mr. Phillips, Mr. Gossett, Ms. Hague, Ms. Lambert, Mr. Dunn, Mr. McDermott,  
Mr. Dembowski, and Mr. Upthegrove  
No: 0  
Excused: 1 – Mr. von Reichbauer

KING COUNTY COUNCIL  
KING COUNTY, WASHINGTON



Larry Phillips, Chair

ATTEST:



Anne Noris, Clerk of the Council

**Attachments:** A. Interpreter Service in King County Proviso Response

# Interpreter Services in King County Proviso Response

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June 30, 2014

Office of Performance, Strategy, and Budget



## Executive Summary

In serving the diverse residents of King County, agencies frequently rely on interpreters to communicate with people who have little or no proficiency in English. Each of these agencies has its own distinct business requirements. For example, District Court and Superior Court require state-certified interpreters who can accurately convey the precise meaning of complex matters from one language to another without injecting bias through their tone or syntax choice. The Department of Public Health (DPH) requires interpreters to have a different state certification along with an understanding of medical terminology in order to help clinical staff effectively communicate with their patients. The King County Sheriff's Office and Department of Adult and Juvenile Detention frequently need to communicate basic information with non-English speakers in dynamic situations where verbatim interpretation is impractical. In order to meet these needs, County agencies have developed their own systems for providing interpreters.

In 2013, the County spent about \$5.4 million to provide interpretation services. The three primary County agencies that utilize interpreter services are the DPH (\$2.5 million in interpreter expenses in 2013), Superior Court (\$1.4 million), and District Court (\$1.0 million). Other criminal justice agencies also have significant interpretation expenses. Beyond this, numerous County agencies occasionally hire an interpreter for a public meeting or call a telephone interpretation service to assist with in-person clients, but these expenses are minimal and were not considered in this report.

The three primary agency users of interpretation services have each set up an independent system of service delivery that is responsive to their own requirements and needs. Superior Court and District Court are subject to state requirements to use interpreters certified by the Administrative Office of the Courts (AOC) for certain languages and registered interpreters (a lower standard) for other languages. Both contract with independent interpreters, but have different methods for doing so. Superior Court's Office of Interpreter Services recruits interpreters for available jobs through personal contact by phone or email. This system gives them a high degree of control and enables them to identify the interpreter they feel will perform best for a given job. District Court posts available interpretation jobs to an online system that qualified interpreters can access to sign up for assignments. When no interpreter signs up for a posted job, District Court staff intervene to identify and recruit an interpreter. DPH employs 18 staff interpreters and uses them for in-person and telephone interpretation. For languages that are not covered by DPH's staff interpreters, DPH contracts with agencies to provide interpretation services.

Because of the differing needs of County agencies requiring interpretation and the differing qualifications and experience required of the professionals who provide interpretation in different settings, any cost savings that might result from developing a single consolidated system of interpreter services would likely be offset by a reduction in quality. Any savings from such a system would be marginal and result from reduced administrative overhead as the change would not have any effect on the number of interpretation jobs or contracts. Furthermore, many medical interpreters are not qualified to perform legal interpretation so even in a consolidated system it would be necessary to maintain separate interpreter pools for different assignments.

Based on this examination of interpreter services with the County, the proviso workgroup made three recommendations that would decrease costs, increase efficiency, improve quality, or increase the availability of interpreter resources. First, agencies should utilize existing State contracts when procuring interpretation services when possible so that individual County agencies do not have to independently negotiate their own contracts. Second, the County should evaluate the potential to expand the use of interpretation by video by exploring the feasibility in different contexts and implementing pilots where possible. Finally, the Department of Public Defense has committed to reviewing its own processes to ensure that it is using interpreter resources provided by the courts as efficiently as possible.

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**Proviso Text**

Ordinance 17695

Section 18

P5 PROVIDED FURTHER THAT:

Of this appropriation, \$300,000 shall not be expended or encumbered until the executive transmits a report on the county's interpreter services and a motion that acknowledges receipt of the report and the motion is passed by the council. The motion shall reference the proviso's ordinance, ordinance section, proviso number and subject matter in both the title and body of the motion.

The executive must file the interpreter services report and motion required by this proviso by June 30, 2014, in the form of a paper original and an electronic copy with the clerk of the council, who shall retain the original and provide an electronic copy to all councilmembers, the council chief of staff and the lead staffs for the budget and fiscal management committee and the law, justice, health and human services committee or their successors.

The report shall be prepared by the office of performance, strategy and budget in consultation with council staff and representatives of the superior court, district court, the department of judicial administration, the prosecuting attorney's office, the sheriff's office, the department of adult and juvenile detention, the department of public defense, the department of public health and any other county departments determined by the executive to have significant expenses related to interpreter services. The report shall review data for 2010 through 2013.

The interpreter services report shall include, but not be limited to:

- A. The actual costs of providing interpreter services within the county;
- B. The utilization of interpreter services by county agencies, including how users of the service are identified and how interpreters are assigned;
- C. An examination of the service delivery methodology used, including quality control and how conflicts are identified and addressed, including the possible use of technology;
- D. An examination of the pros and cons for developing a consolidated system for the provision of interpreter services countywide; and
- E. Recommendations for improvements or changes to the current system for the provision of interpreter services.

## **I. Background**

Census data show that a quarter of King County's population – over 450,000 residents – speaks a language other than English as their first language. Of these, about a quarter speaks Spanish as their first language. In total, more than 170 different languages are spoken in King County, including American Sign Language (ASL) and other sign languages for the hearing impaired. While many of these residents who did not learn English as their native language are fluent in English, about 11 percent of County residents, or nearly 200,000 people, have limited English proficiency and would be challenged to communicate effectively with County agencies, which could impede their access to services.

These limited English-proficient (LEP) residents rely on a variety of services provided by King County. Like English-speaking residents, they utilize clinics operated by the Department of Public Health; come into contact with the Sheriff's Office as victims, witnesses, and suspects of crimes; utilize District Court and Superior Court for the resolution of criminal and civil matters; rely on prosecuting and defense attorneys to represent them in court; and, sometimes, end up in a County jail. In these and other interactions with King County agencies they must communicate with County employees, and rely on County-provided interpreters to do so.

Interpretation is the unrehearsed conversion of oral information from one language to another by an interpreter who is fluent in both languages. It is distinct from translation, which is the conversion of written text from one language to another. The ability to rapidly and accurately transfer information from one language to another is a complex skill learned through experience and training and requires dual cultural fluency, knowledge of the subject, proficiency in both languages sufficient to relay full meaning interpreting in either direction, and an understanding of the protocol required to be effective and ethical in the medical, social service, or legal setting. For example, the English phrase "under the weather" cannot be translated literally word for word and convey the meaning of being sick. A skilled interpreter is able to convey not just the words of the original speaker but the tone, context, and meaning behind them.

Interpreters perform their work in one of two primary modes: consecutive and simultaneous. In consecutive interpretation the speakers pause to allow the interpreter to interpret what they have said so that only one person is speaking at any one time. Simultaneous interpretation requires interpreters to listen, interpret, and speak at the same time, providing interpretation that lags a few seconds behind the original. In a courtroom setting, simultaneous interpreters typically speak into a microphone that is relayed to headsets worn by the parties requiring interpretation during trials. For shorter hearings, the interpreters stand next to the LEP individual to interpret all of the court proceedings. Interpreters may also be asked to provide sight translation, the oral translation of written documents such as legal and medical forms.

A wide range of County agencies may occasionally use interpreters at a public meeting or call a language line for telephonic interpretation during a drop-in visit to a service window. For example, the River and Flood Plain Management section of the Water and Land Resource Division (WLRD) in the Department of

Natural Resources and Parks estimates that they spend between \$3,000 and \$7,000 annually on translation of written materials and interpretation of public meetings, video content, and public inquiries. WLRD procures these services through existing King County translation contracts, community organizations such as American Red Cross's Volunteer Language Bank and LanguageLine, a telephone interpretation service.<sup>1</sup> For the purposes of this report, the Office of Performance, Strategy and Budget (PSB) considers interpreter expenses on this scale to be insignificant and did not attempt to inventory them comprehensively.

Based on PSB's review, the agencies with significant ongoing interpreter costs are the Department of Public Health; the Mental Health, Chemical Abuse and Dependency Services Division (MHCADS) of the Department of Community and Human Services; King County Superior Court; King County District Court; and the Prosecuting Attorney's Office. The Department of Public Defense is a frequent user of interpretation services provided and paid for by Superior Court and District Court but does not expend its own funds on interpreters. Other criminal justice agencies also have interpreter costs, but spend much less on interpretation than the courts. King County Airport has had interpretation expenses in recent years related to a noise reduction program which are largely reimbursed by the Federal Aviation Administration. The Airport's noise reduction program will be ending at the end of 2014.

These agencies serve diverse clientele, have different interpretation needs, and have developed processes that fit their business need for providing interpreters and ensuring the quality of their work. In addition, different types of interpretation have different standards and require different qualifications. For example, medical interpreters are often not qualified to serve as court interpreters and vice versa.

In addition to providing interpretation, some County agencies deliberately recruit multilingual staff through tools such as incentive pay and extra points in scoring as part of their efforts to serve LEP individuals. While these staff facilitate communication with the agency, they do not necessarily provide interpretation between English and another language.

The next section this report will explore the interpretation needs and processes used by County agencies as well as the estimated costs of providing interpretation services for 2010-2013. Section III will discuss the pros and cons of creating a countywide centralized interpretation service. The concluding section will provide recommendations for improvements to the current system of providing interpreter services in King County.

To prepare this report, PSB interviewed and convened staff from the agencies with significant interpretation needs to understand the actual costs of providing interpreters services, how the need for interpretation is identified and how interpreters are assigned, to examine the service delivery methodology used throughout the County, and to discuss the pros and cons of a consolidated system for interpretation services. The agencies involved include: Department of Public Health, Department of Adult and Juvenile Detention (DAJD), District Court, the King County International Airport, the Prosecuting Attorney's Office (PAO), the Sheriff's Office, Superior Court, the Department of Public

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<sup>1</sup> Resources for agencies requiring occasional interpretation assistance can be found on the King County website at <http://www.kingcounty.gov/audiences/employees/translation-interpretation.aspx>.

Defense (DPD), and County Council Staff. The Department of Judicial Administration was also invited to participate, but stated that their organization is not involved in the provision of interpreters.

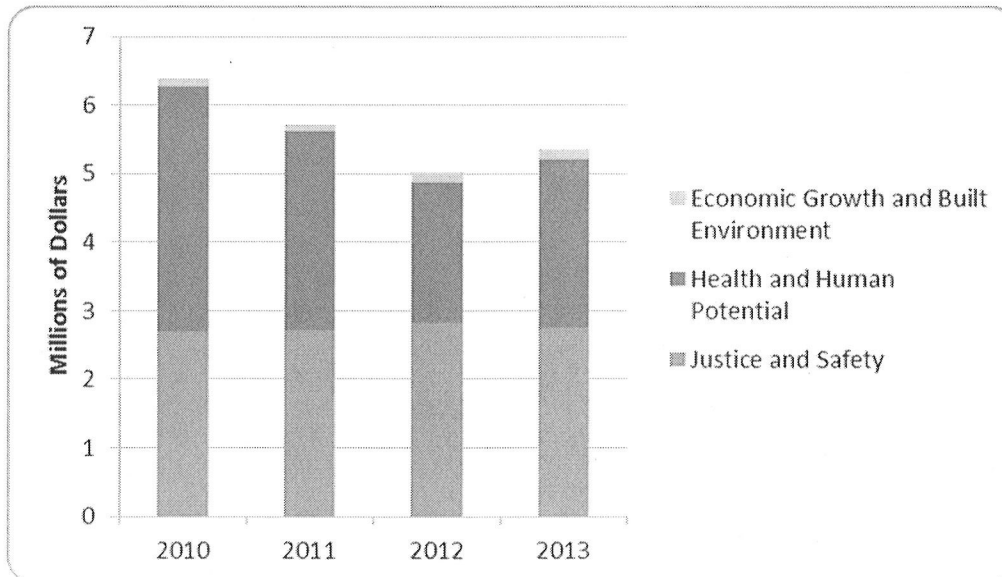
**II. Cost and Utilization of Interpreter Services and Service Delivery Methods**

Over the 2010 to 2013 period, King County agencies incurred between \$5 million and \$6.5 million per year in expenditures on interpretation. Of the total \$22 million spent on interpretation over the entire period, almost half was spent by the Department of Public Health and nearly all of the rest was spent in the criminal justice sector. This figure does not include costs from customer-serving agencies that may have occasional interpreter costs that likely total less than \$20,000 per year.

**King County Interpretation Costs by Agency, 2010-2013<sup>2</sup>**

	2010	2011	2012	2013	2010-13 Total
King County Airport	105,085	106,465	136,522	145,367	<b>493,439</b>
Department of Public Health	3,591,726	2,903,007	2,051,030	2,461,831	<b>11,007,594</b>
Department of Community and Human Services	64,759	70,220	80,418	72,801	<b>288,198</b>
Superior Court	1,391,958	1,446,556	1,546,353	1,418,943	<b>5,803,810</b>
District Court	971,639	944,378	945,110	999,763	<b>3,860,890</b>
Prosecuting Attorney’s Office	229,449	218,131	229,362	230,302	<b>907,244</b>
Department of Adult and Juvenile Detention	17,296	16,501	17,297	17,837	<b>68,931</b>
Sheriff’s Office (est.)	13,000	13,000	13,000	13,337	<b>52,337</b>
<b>TOTAL</b>	<b>6,384,912</b>	<b>5,718,258</b>	<b>5,019,092</b>	<b>5,360,181</b>	<b>22,482,106</b>

**King County Interpretation Costs by Strategic Plan Goal, 2010-2013**



<sup>2</sup> Because it does not include agencies with de minimis interpretation costs, this table does not reflect the entirety of King County’s interpretation expenditures. However, it does include the vast majority.

## Use of Interpreters in the Economic Growth and Built Environment Goal

### *King County Airport*

#### *King County Airport Interpretation Costs, 2010-2013*

	2010	2011	2012	2013	Total
Expenditures	105,085	106,465	136,522	145,367	493,439

All of the King County International Airport's 2010-2013 interpreter expenditures were on a noise reduction program that will be completed at the end of 2014. The Federal Aviation Administration reimbursed the Airport \$461,498, or all but \$31,940 of their 2010-2013 interpreter expenses. Because these interpreter expenditures are associated with a reimbursed program that is nearly complete this report does not explore the service delivery method used by the Airport.

## Use of Interpreters in the Health and Human Potential Goal

### *Department of Public Health*

Within the Department of Public Health (DPH), interpreters are most frequently utilized at the 10 public health clinics. In recent years, DPH has provided interpretation for over 30,000 public health clinic visits per year, or an average of roughly 130 visits per day. DPH also uses interpreters in its Jail Health Service, Environmental Health, and Prevention divisions. Environmental Health sometimes uses interpreters when working in the community, for example during restaurant inspections or when issuing health cards. The Prevention division operates tuberculosis and HIV/STD clinics at Harborview Medical Center. Both the Environmental Health and Prevention divisions use the same process for assigning interpreters as the clinics, which is described below. Aside from sign language interpretation, Jail Health Services relies on telephone interpretation almost exclusively due to the difficulty in securing security clearance for interpreters entering the jail.

In DPH's interpreter service delivery model, interpreters are provided from one of four sources. When possible, clinical interpretation is performed by one of 18 staff interpreters. DPH also maintains a pool of 19 short-term temporary interpreters who serve on an on-call basis. In addition to these in-house resources, DPH contracts with three interpretation agencies which provide onsite interpreters fluent in a wide variety of languages including American Sign Language (ASL). DPH also utilizes telephone interpretation services through Pacific Interpreters, which recently merged with LanguageLine, for on-demand interpretation and visits that do not require an in-person interpreter. Additionally, DPH recruits multilingual clinical staff who can serve LEP residents in their own language without interpretation.

Of the 18 staff interpreters, 16 speak Spanish, one speaks Somali, and one speaks Russian. The staff interpreters are stationed within the public health clinics. DPH assigns interpreters to sites based on known demand for interpretation. For drop-in clients, telephone interpretation is used unless there is an on-site interpreter available. In order to maximize the use of staff interpreters, clinic-based staff interpreters are available to provide interpretation to other clinics by phone when they are not working



with in-person clients. Some staff interpreters are also assigned to telephone interpretation on specific days as part of their regular work assignment.

Both staff and contract interpreters who work in the clinics must be certified or authorized by the state Department of Social and Health Services (DSHS). DSHS administers certification exams in Spanish, Russian, Vietnamese, Mandarin, Cantonese, Korean, Cambodian, and Laotian. Interpreters of all other languages are authorized by DSHS using a different and less comprehensive screening test. DSHS also provides credentials to interpreters who have passed examinations offered by the Washington Association of the Courts or by the Federal Courts. All clinical interpreters must be trained in the privacy requirements of the Health Insurance Portability and Accountability Act and onsite interpreters must also maintain current vaccinations.

Aside from DSHS certification and authorization, DPH maintains the quality of interpretation service provided in several ways. For staff interpreters, DPH is careful to hire interpreters experienced in medical terminology. All onsite interpreters are reviewed via observation and feedback from healthcare providers, who themselves are trained in how to utilize interpreters effectively during their orientation. When DPH notices deficiencies in the service provided by contract interpreters they report back to the vendor and request that they correct the deficiency or provide a different interpreter in the future.

Maintaining the quality of interpreters provided through the telephone interpretation contract is more difficult for several reasons: these interpreters are located all over the country and some are overseas and not as familiar with the US healthcare system; most are working from home; and it is more challenging for the phone interpretation companies to control the environment in which these workers provide service and the quality of the interpretation provided by these remote workers who take thousands of calls per day. For this reason DPH prefers to have their own staff interpreters provide interpretation by phone but is forced to use contract telephone interpreters because only three languages are represented by those staff.

***Department of Public Health Interpretation Costs, 2010-2013***

	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>Total</b>
Labor	3,405,684	2,694,813	1,898,822	2,227,769	<b>10,227,088</b>
Contract interpreters	186,043	208,194	152,208	234,061	<b>780,506</b>
<b>Total</b>	<b>3,591,726</b>	<b>2,903,007</b>	<b>2,051,030</b>	<b>2,461,831</b>	<b>11,007,593</b>

Concerned with increasing interpreter costs, in 2011, DPH reviewed all types of clinic visits and determined which required in-person interpretation and which could use telephonic interpretation. As a result, the department was able to substantially reduce its interpretation costs starting in 2011. Between 2010 and 2013, DPH’s interpreter expenditures declined from \$3.6 million to \$2.5 million.

***Department of Community and Human Services***

Within the Department of Community and Human Services (DCHS), most services are provided through contracts with third-party providers; however, designated mental health professionals (DMHPs) in Crisis and Commitment Services (CCS) do provide direct service to the public and frequently use interpreters



when they are serving LEP clients. CCS relies on County contracts with interpretation agencies and when necessary uses LanguageLine to provide telephone interpretation. CCS does not have a coordinator to assist with scheduling and arranging interpreters; the DMHPs contact the contract services to request interpreters when needed and for the most part rely on the contractors to assure the quality of the interpreters they send.

In addition to interpretation for DMHPs working in the field, CCS is also responsible for interpretation for hearings at Involuntary Treatment Act (ITA) Court at Harborview Medical Center. Although ITA Court is part of Superior Court, its expenses are reimbursed by funding from Washington State managed by CCS. The interpretation service delivery model utilized in ITA Court is discussed below in the Justice and Safety section.

***Department of Community and Human Services Interpretation Costs, 2010-2013***

	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>Total</b>
Expenditures	64,759	70,220	80,418	72,801	<b>288,198</b>

For the 2010-2013 time period, DCHS is unable to separate interpretation costs for designated mental health professionals from those for ITA Court. However, DCHS estimates that at least 90 percent of the interpretation costs shown here were for ITA Court.

**Use of Interpreters in the Justice and Safety Goal**

In order to preserve access to justice, victims of crime and defendants who are not proficient in English must be provided with an interpreter in their domestic language at public expense, regardless of their ability to pay. The U.S. Department of Justice has held that this also applies to *all* court proceedings whether civil, criminal or administrative and also includes all non-party limited English proficient individuals who are involved in a court matter. In Washington State, the right to an interpreter in legal proceedings is established in statute in Revised Code of Washington (RCW) 2.42 for deaf and hearing impaired persons and in RCW 2.43 for non-English speaking and limited English speaking persons. In addition to the statutory requirements, Washington Courts General Rule (GR) 11 establishes the Interpreter Commission to guide the State’s interpreter program, provides a code of conduct for court interpreters, and establishes rules governing the use of telephone interpretation in court.

Aside from courtroom interpretation for defendants and civil litigants, interpreters may also be required for prosecution and defense witnesses in court, victims’ families, attorney-client interviews while preparing a case, meetings with social workers, and for attendance at court-ordered programs. Outside of the courts, police regularly interact with LEP members of the public both in the normal course of daily business and during investigations. The Sheriff’s Office and DAJD both rely upon bilingual staff able to interact with LEP populations in their primary language and also procure interpreters as needed for interactions with non-English-speaking citizens and inmates.

For some languages needed to allow equal access to the courts, the Washington Administrative Office of the Courts (AOC) credentials interpreters through examinations. In their efforts to improve and standardize quality of interpretation and equal access to the courts, the AOC’s Interpreter Commission

maintains a list of 15 languages for which court certified interpreters are required unless reasons for not doing so are noted in the record. AOC classifies an additional 61 regularly needed but less stringently tested languages as registered. As with certified languages, registered interpreters must be used for these languages unless reasons for not doing so are noted in the court record.

Attaining certification with AOC requires passing written and oral interpretation exams. Registered interpreter status is a lesser standard requiring a written exam and a speaking assessment exam. Both registered and certified interpreters must also pass a criminal background check and attend mandatory classes. Interpreters for languages that are not registered or certified are queried on the record by the judge regarding their interpreting experience, qualifications, and ability to provide quality interpretation for the matter before the court. However, their abilities have not usually been formally tested and they often have received no training outside of the courts.

For some languages classified as certified or registered by AOC, no interpreters have passed the test and there are no certified or registered interpreters available in the state. For courtroom interpretation in languages which are neither certified nor registered or for which certified or registered interpreters are not available, the court is responsible for qualifying the interpreter provided them and ensuring that they possess the proficiency required to interpret in the given matter.

Within the courtroom, District Court and Superior Court are responsible for providing interpreters for defendants and defense witnesses who need them so that they can communicate with the court. This includes providing multiple interpreters in cases with multiple LEP defendants in order to prevent conflicts as well as making interpreters available for attorney-client meetings with defense. The Prosecuting Attorney's Office procures its own courtroom interpreters for State witnesses, victims, and parents of involved children when necessary. When the State has many witnesses speaking the same language, their testimony can be interpreted by the same interpreter. However, there may be multiple interpreters of the same language present in the courtroom because of the potential for inaccuracy related to fatigue of a single interpreter, because each defendant requires a unique interpreter due to the possibility of conflicts, or because prosecution witnesses require different interpreters from defense.

At times these requirements lead to complex situations involving multiple interpreters and multiple languages. For example, during a recent dependency hearing, the mother was a speaker of Somali Maay Maay and a witness testifying by telephone from another state was a Swahili speaker. Two Somali Maay Maay interpreters were present in the courtroom and took turns providing interpretation of all proceedings to the mother at roughly 20 minute intervals. One of the Somali Maay Maay interpreters provided simultaneous interpretation via a headset while the other used consecutive interpretation during his turn. During the Swahili speaker's testimony, his statements were interpreted for the court by a Swahili interpreter using consecutive interpretation.

RCW 2.43.040 specifies that AOC may reimburse counties provides for up to half of county costs for courtroom interpretation. However in recent years the statewide appropriation for this purpose has been \$1.2 million per biennium – less than half of what King County spends on courtroom interpretation. Workgroup participants stated that this provision is primarily intended to help smaller

counties improve their courtroom interpretation systems and that when the program was first implemented King County was discouraged from applying for reimbursement. Neither District Court nor Superior Court has applied for funding in recent years and it is unlikely that either would receive any funding should they do so in the future.

### ***King County District Court***

District Court orders, procures, and remits payments to contract interpreters through its Interpreter Web online application, which has been in place since 2004 and won the prestigious Justice Achievement Award presented by the National Association of Court Management in 2006. In 2008, District Court sold a copy of the Interpreter Web application to Snohomish County, which currently uses it to manage interpreter services for its Superior Court, Juvenile Court, and District Court. Three employees in the Office of the Presiding Judge (OPJ) devote part of their time to overseeing the Interpreter Web system and ensuring that interpreters are available when necessary. In addition to the contract interpreters assigned through Interpreter Web, District Court employs two full-time Spanish interpreters, one in Kent and one in Seattle. District Court provides interpreters for an average of 60 hearings each day, which are consolidated into an average of 34 interpreter jobs, as well as providing interpreter coverage for Saturday, holiday, and Vashon Island court proceedings as needed. District Court interpreter assignments occur in 8 courthouses and over a dozen other locations including jails and defense attorney offices. These assignments have covered 151 languages.

As part of its effort to improve service to LEP residents, District Court offers court staff an additional pay step upon hire for legal bilingual skills. These bilingual employees do not provide courtroom interpretation, but are called upon to assist the public at the front counter, telephonically through the Court's call center, and during probation appointments. Through observation, the Court validates the employee's ability to interpret legal matters with the public prior to assigning the additional pay.

LEP and hearing impaired individuals who need interpretation are usually identified by clerks, but may also be identified by police, jail staff, attorneys, calls to the call center, or a checkbox on the hearing form. After identifying LEP and hearing impaired individuals in need of interpretation and the language they need, District Court clerks enter the request for an interpreter into their case management system and the Interpreter Web. This function may also be performed by DAJD personal recognizance screeners for in-custody defendants. When possible, District Court clusters hearings requiring interpretation in a specific language so that it is possible for a single interpreter to cover multiple hearings. An interpretation job in District Court may be for a single hearing or for a jury trial lasting multiple days.

Approximately 550 interpreters approved by the Court may log in to Interpreter Web and sign up for unassigned jobs available in the languages that they are eligible to cover. In order for an interpreter to be qualified by the Court, he or she must complete a new interpreter orientation with OPJ interpreter services staff to ensure familiarity with the court policies and procedures and to verify the interpreter's qualifications to provide legal interpretation. This orientation is required for all new interpreters, including those that are also certified and registered. The Court typically starts new interpreters with rudimentary matters as an introduction to legal interpretation.

Once a request for an interpreter of a specific language for a specific hearing is entered into Interpreter Web, it becomes visible as an unassigned job to interpreters based on system-defined rules to promote the most qualified interpreter to be eligible to view the job assignment. Interpreters receive system generated e-mails each time an assignment changes, such as when another case is added, the time is changed, or the assignment is cancelled. Once the job is complete, invoices are sent to the County's finance system through Interpreter Web. Most requests for interpreters are filled in this way with minimal staff involvement by District Court.

In some cases, no one signs up for a case or hearing and District Court OPJ staff use other resources to find an interpreter, such as a listserv maintained by AOC for courts to ask each other for assistance finding legally qualified interpreters. District Court also frequently uses telephone interpretation for certain types of hearings, such as name changes, and for probation appointments and calls to the Court's call center. District Court does not bring in out-of-town interpreters, so they also rely on telephone interpretation for cases where they are unable to find an interpreter locally.

District Court's rate for interpreters is \$45 per hour for certified and registered interpreters and \$40 per hour for qualified interpreters of languages that are not certified or registered. Interpreters for persons who are hearing impaired are paid \$65 per hour. Interpreters are paid for a minimum of two hours with two exceptions: Attorney-client interviews and telephonic interpretation are subject to a 30 minute minimum. Interpreters are paid for their job at the minimum rate if the job is cancelled within 24 hours of the start time.

District Court provides defense attorneys in misdemeanor matters with interpreters for attorney-client interviews upon court order. Once attorneys receive their court order authorizing interpreter services for their meeting they submit them to the interpreter services staff in OPJ, and a job is created in Interpreter Web for the requested date and time of the meeting. These interpreter requests are filled in the same manner as court proceedings. However some public defense attorneys feel that the quality of interpreters procured through Interpreter Web is inconsistent and that the contract interpreters provided by District Court are not as thoroughly vetted as those provided by Superior Court. Some defense attorneys also expressed frustration at interpreters failing to show up for scheduled client meetings, especially for meetings with in-custody clients.

***District Court Interpretation Costs, 2010-2013***

	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>Total</b>
Labor	315,351	329,485	332,841	362,448	<b>1,340,125</b>
Contract interpreters	656,289	614,893	612,269	637,315	<b>2,520,766</b>
<b>Total</b>	<b>971,639</b>	<b>944,378</b>	<b>945,110</b>	<b>999,763</b>	<b>3,860,890</b>

District Court's interpretation expenses have remained just below \$1 million per year throughout the 2010 - 2013 period. In addition to 2.0 full time Spanish interpreters, District Court has three positions that are partially dedicated to the interpretation program. According to the Court, approximately 85 percent of the interpreter coordinator's time, 65 percent of the payroll manager's time, and 25 percent of an office technician's time are also spent on interpretation for an estimated total of 3.75 FTEs. The

labor costs above include interpreters and administrative staff using these time estimates and are based on the amounts budgeted for these positions rather than actual expenditures. The contract interpreter costs shown are actual expenditures. Although District Court's contract interpretation costs have remained around \$650,000 per year throughout 2010-2013, they have been significantly under-budgeted during this period.

### ***King County Superior Court***

In contrast to District Court's largely automated system of assigning interpreters, Superior Court's business processes for assigning interpreters require much more staff involvement and oversight. Interpreter assignments in Superior Court's four locations are managed by the Office of Interpreter Services (OIS), which currently has seven full-time positions, including three court certified Spanish interpreters. OIS does have online systems to help them manage scheduling, interpreter contacts, assignments, and conflicts, but their systems do not have an external interface that interpreters can access to sign up for jobs on their own. OIS typically assigns interpreters to about 60 events per day, spread among four locations. Since 1992, OIS has assigned interpreters in 145 languages.

OIS receives requests for interpreters from various sources including litigants, family members, and court personnel. Once requests come in, OIS confirms that there is an active case in Superior Court and then works to identify the language and interpretation need and to check case notes to see if the interpreter has a potential conflict due to having previously worked with someone involved in the case. Actual assignment of interpreters is done by staff contacting interpreters directly via email and telephone.

In addition to providing in-court interpreters for clients who need them, OIS performs numerous additional functions designed to improve the quality of courtroom interpretation. These include orientation for interpreters; training for those who use interpreters, including judges and attorneys; conflicts screening; and screening, observation and guidance for new interpreters. OIS typically starts new interpreters on relatively simple cases where they can be easily observed before using them on more complex cases.

As with District Court, OIS pays \$45 per hour for interpreters of certified and registered languages and \$40 per hour for interpreters of languages that are not certified or registered. Interpreters are paid for a minimum of two hours for in-person interpretation and one hour for telephonic interpretation.

For languages that OIS is unable to find locally, interpreters are brought in from out-of-state for assignments lasting longer than a day. For shorter assignments, Superior Court uses telephone interpretation if they are unable to find an interpreter locally. Interpreter events in Superior Court may be for a one-time hearing or for a criminal trial lasting multiple weeks or months. The severity of the cases varies widely from a simple divorce to a homicide trial with life in prison at stake.

A single case may need multiple interpreters one of several reasons. This is especially true of civil cases. A case may have multiple LEP parties speaking different languages, each requiring his or her own interpreter. Cases with multiple LEP parties speaking the same language may also require separate

interpreters for each due to the potential for conflicts of interest that could arise if a single interpreter provided interpretation for all parties. However, for certain hearing types a single person may interpret for multiple co-defendants. Finally, even if there is only a single LEP party in the courtroom, a second interpreter may be needed to provide breaks in cases that require interpretation for long stretches due to the mental demands of interpreting continuously for long periods at a time.

As is true with District Court, OIS also provides interpreters for defense attorney interviews with clients in felony cases. Department of Public Defense representatives expressed a high level of satisfaction with the quality of interpreters provided by OIS. According to the Department of Public Defense, the issue with interpreters in Superior Court is not with the quality of the interpreters; it is with the number and capacity of available interpreters which makes scheduling difficult.

***Superior Court Interpretation Costs, 2010-2013***

	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>Total</b>
General Fund - Labor	517,498	525,900	536,952	478,189	<b>2,058,539</b>
General Fund - Contract Interpreters	820,316	865,650	962,234	896,864	<b>3,545,064</b>
General Fund Total	1,337,814	1,391,550	1,499,186	1,375,053	<b>5,603,603</b>
Grant Fund	54,144	55,006	47,167	43,890	<b>200,207</b>
<b>Total</b>	<b>1,391,958</b>	<b>1,446,556</b>	<b>1,546,353</b>	<b>1,418,943</b>	<b>5,803,810</b>

Superior Court’s annual interpretation costs have been between about \$1.4 and \$1.5 million per year between 2010 and 2013. The Court’s Office of Interpreter Services currently has 7.0 FTEs, and was budgeted at 8.0 FTEs prior to 2014. In the 2014 Agency Proposed Budget, the Court requested to convert a vacant interpreter position into additional contract interpreter funding to better fit the Court’s business needs.

***Prosecuting Attorney’s Office***

The Prosecuting Attorney’s Office (PAO) procures interpreters to allow access to all of its services, which are focused on crime victims and witnesses. A single position within PAO is primarily dedicated to identifying, procuring, and overseeing contract interpreters and translators needed by its many divisions and units and may perform work to assist other King County departments whose legal interests are represented by the PAO. The PAO recognizes that the quality of interpretation provided either creates a bridge to its services for LEP individuals or fails to do so. In criminal matters, the quality of the interpreters provided during the police investigation, throughout the interviews required to build the case, and in court for testimony during trial has a direct bearing on the strength of the prosecution’s case. Access to justice for LEP individuals can only be assured when witnesses or victims feel interpreters used in investigations adequately and fully represent their fears and the facts surrounding incidents that affected them.

Although the PAO is not subject to the same requirements set by AOC as the courts, the interpreters it procures meet or exceed the requirements set by AOC’s Interpreter Commission. In addition, the PAO’s



interpreter coordinator has served on the AOC's Interpreter Commission and in this capacity has worked on setting standards and ethics guidelines for court interpreters.

In criminal matters, the PAO's interpreter costs are often front-loaded – costs associated with the investigation and preparation of a case are typically greater than the costs required to assure meaningful courtroom testimony. The PAO's involvement in interpretation for a criminal case may begin as early as support to the police at the time of the incident or during the follow-up investigation. The PAO frequently helps police officers and detectives identify the languages of its witnesses and the languages found on recordings during investigations. The PAO may then assist police in identifying and procuring an appropriate interpreter to assist in investigative tasks or participate in interviews of witnesses. The PAO also advises police agencies regarding policies and procedures for interpreter use and how to avoid ethical concerns.

PAO involvement in interpretation during the law enforcement investigation improves LEP access to justice in significant ways. The PAO handles many more interpreter matters than any one police agency will ever see, giving the PAO broad experience regarding which interpreters are best for particular matters. The PAO uses these interpreters strategically. By using the same interpreter throughout the investigation and legal process, the interpreter gains context of the matter. Because the process of interpretation involves a decision regarding what word in another language best conveys the full meaning of an utterance, this increased context results in greater accuracy of witness statements. The PAO bases filing decisions on these witness statements. Although PAO provides assistance to police departments in procuring interpreters, the interpreter costs at this stage are borne by the police.

The PAO coordinator maintains a broad network of interpreters built through over 30 years of experience. This network includes qualified interpreters including Federal and State certified and registered interpreters from all over the United States. It also includes individuals from academia, social service agencies, refugee resettlement agencies, police agencies nationwide at multiple jurisdictional levels, local and national court coordinators and others inside and outside the United States.

As part of its quality control process, PAO coordinator considers the specific details of each case when selecting an interpreter. For example, he will attempt to find an interpreter comfortable with technical finance vocabulary for a mortgage fraud case, or a doctor qualified as an interpreter to allow a victimized LEP doctor to testify about injuries in his or her own vernacular. PAO coordinates with Superior Court's OIS in order to avoid conflicts by making sure that different sides of the same case are not using the same interpreter.

PAO puts great care into identifying the appropriate interpreter for a given individual, keeping in mind the specific language, dialect, and cultural issues. This is not always as simple as it seems – for example, police may request assistance in identifying an interpreter of "Arabic." Arabic has many regional variants, and while written materials are mutually intelligible, spoken Arabic often varies considerably. To ensure that the interpreter captures the nuance from the original speaker, the PAO coordinator first identifies the speaker's specific dialect and then finds an interpreter familiar with that dialect. Similarly, the PAO coordinator takes cultural considerations into account when making interpreter assignments.

For example, he would make every effort to avoid assigning a Hutu interpreter to a Tutsi witness despite the fact that they speak the same language. Political events can also drive interpreter choice. A short while ago an interpreter who spoke both Russian and Ukrainian might have been an appropriate choice to interpret for either language. Now, depending on an individual witness's personal relationship to the political situation there, the same interpreter may no longer be appropriate.

Like the courts, the PAO pays interpreters for a two-hour minimum. Some interpreters waive their fee for short calls. In other cases, when interpreters finish a PAO job early they contact the coordinator to see if the purchased interpretation time can be used elsewhere. When necessary, the PAO brings interpreters in from out of town if local interpreters are unavailable. This might also be required if local interpreters would have a bias one way or the other regarding the LEP witness. PAO uses telephone interpretation for simple matters like directions or scheduling, but in general uses in-person interpreters almost exclusively.

***Prosecuting Attorney's Office Interpretation Costs, 2010-2013***

	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>Total</b>
Labor	103,854	102,717	109,120	114,371	<b>430,062</b>
Contract Interpreters	125,595	115,414	120,242	115,931	<b>477,182</b>
<b>Total</b>	<b>229,449</b>	<b>218,131</b>	<b>229,362</b>	<b>230,302</b>	<b>907,244</b>

PAO's interpreter costs have remained stable at about \$230,000 per year between 2010 and 2013. These costs represent contract interpreters costs plus 1.0 full time staff position to coordinate and arrange for interpreters.

***Involuntary Treatment Court***

As the result of a Lean process that is currently being implemented at ITA Court, the process for procuring, compensating, and overseeing interpreters there changed on April 2, 2014. In the past, the CCS court scheduler arranged for ITA Court interpreters directly by calling interpreters from a list of contacts who had been used in the past. As part of the Lean process, CCS compared its interpreter list with that maintained by Superior Court and discovered that in addition to paying a higher rate, CCS was also paying for mileage and parking while the Court was not. Under the new system, Superior Court staff at ITA Court will make interpreter requests to OIS, which will procure and schedule interpreters and compensate them at Superior Court's rates. CCS will then reimburse the Court for the cost of interpretation provided at ITA Court.

***King County Sheriff's Office***

While the courts require precise interpretation by the most qualified interpreters available in order to ensure the fair administration of justice, the King County Sheriff's Office (KCSO) needs expedient ways to share basic communication with LEP citizens in potentially hazardous settings. When responding to a call for service, officers on the scene do not have the time to procure an in-person interpreter and in many cases may not even have enough time to place a call to a telephone interpretation agency.



Instead, KCSO has found alternative ways to communicate with LEP members of the public. One strategy employed by KCSO is recruitment of multilingual officers. Although KCSO does not provide additional pay for language skills, the agency deliberately recruits people proficient in targeted languages and provides additional points for language fluency when scoring applicants. If an officer fluent in a particular language is not available, officers on the scene may call LanguageLine for telephone interpretation. Another strategy employed by KCSO officers when necessary is to use bilingual bystanders or family members to facilitate communication. In the spring of 2014, KCSO issued smart phones to all officers and began experimenting with interpretation apps to assist with communication; however the results of this pilot were not clear at the time of this report.

In addition to communication in potential crisis situations during responses to calls, at times KCSO also requires interpretation during investigations. In comparison to on-the-scene communication, interviews during investigations have more flexibility in scheduling as well as a greater need for reliable interpretation, as the interview transcript may end up as evidence in a court case. For interpretation during investigations, KCSO frequently asks for assistance from the PAO in identifying appropriate individuals to provide in-person interpretation.

The Sheriff's Office reports that 2013 interpreter costs were \$13,337, but is unable to accurately calculate its interpreter expenditures for 2010-2012 due to reporting limitations. However, KCSO believes that the 2013 interpretation costs were consistent with prior years. KCSO does not have budget specifically allocated to interpretation.

***Department of Adult and Juvenile Detention***

The Department of Adult and Juvenile Detention (DAJD) uses interpreters to communicate with LEP inmates during intake, classification, and at other points during routine operations when staff need to communicate with inmates and are unable to do so effectively using English or non-verbal cues. DAJD procures interpreters through two primary mechanisms.

First, DAJD employees in certain bargaining units are eligible for a \$500 per year stipend if they speak a language needed in jail operations, as identified by DAJD management. Presently, Spanish, Vietnamese, and Russian are approved for language stipends, and the large majority of recipients are Spanish speakers. In order to qualify for the stipend, the employee must pass a language proficiency assessment administered by Superior Court. This assessment is much less extensive than the legal interpretation exams administered by AOC, and the employees who receive language stipends are used only to assist with day-to-day jail operations and conversational communication. Currently, approximately 30 DAJD staff receive the language stipend.

In cases where staff need to communicate with inmates and are not able to use other DAJD staff to do so, DAJD hires contract interpreters. In addition to these modes of interpretation, DAJD sometimes relies on inmates' family members or other inmates to facilitate communication.

***Department of Adult and Juvenile Detention Interpretation Costs, 2010-2013***

	2010	2011	2012	2013	Total
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Language Stipend	14,380	15,005	15,855	15,423	<b>60,663</b>
Contract Interpreters	2,916	1,496	1,442	2,414	<b>8,268</b>
<b>Total</b>	<b>17,296</b>	<b>16,501</b>	<b>17,297</b>	<b>17,837</b>	<b>68,931</b>

The largest component of DAJD’s interpreter costs is the language stipend paid to staff that are verified as fluent in a language needed in jail operations.

### III. Potential for a Consolidated Interpreter System

#### *Pros and Cons of Developing a Consolidated System for the Provision of Interpreter Services*

<b>PRO</b>	<b>CON</b>
Would formalize collaboration and the sharing of resources	It is not clear that interpreters want to be shared – some medical interpreters are not qualified for or interested in courtroom interpretation and vice versa
Possible savings in administrative staff	The fundamental differences between medical and legal interpretation and between District Court needs and Superior Court needs mean that parallel interpreter pools will need to be maintained, likely limiting administrative savings
	Potential loss of agencies’ ability to independently control quality of interpreters and monitor conflicts of interest
	Using the same interpreter for both sides in an adversarial system could lead to mistrials and overturned convictions

As shown in this report, interpreter services in King County are provided in different ways by each of the three biggest agency users of interpretation. Department of Public Health has a large in-house pool of interpreters that it uses as much as possible and supplements with contract interpretation agencies. Superior Court relies on contracts with individual interpreters and expends significant resources on identifying the best available interpreter for each job, maintaining and growing the interpreter pool, and providing quality control and training. District Court maximizes efficiency by using an online system to post its interpretation needs and allowing individual contract interpreters to sign up for these jobs on their own. This diversity of practice raises the question of whether interpretation services could be provided more efficiently throughout the County if the service delivery model were centralized. However, after discussing the issue, the proviso workgroup concluded that moving towards a consolidated King County interpreter system would not be practical for several reasons.

Because interpretation in a medical clinic and a courtroom require different credentials, different vocabulary, and a different role for the interpreter consolidation of these services would not reap any operating efficiencies in how interpreters are deployed. During a clinic visit, an interpreter may advocate on behalf of the patient to a degree, ask the patient clarifying questions before presenting their answer back to the clinician, or clarify a clinician’s question if the patient did not understand their initial attempt at asking it in their own language. In contrast, a courtroom setting requires the interpreter to refrain

from injecting bias by attempting to clarify when parties are having difficulty understanding, even when the interpreter can identify the source of confusion. Although some interpreters are able to switch roles and are comfortable in both settings, anecdotal evidence suggests that many public health interpreters are not qualified or interested in interpreting in a legal setting and vice versa.

The potential for consolidating interpreter services for Superior Court, District Court, and Prosecuting Attorney's Office also presents great enough challenges that the proviso workgroup felt that it was not a productive path to pursue. First, the difference in case types between District Court and Superior Court is great enough that they have very different concerns about quality control. For example, the efficiency gained in District Court by having interpreters sign up for hearings on their own once they are qualified by the Court may well be worth the loss of the ability to hand select a preferred interpreter for a specific job for the types of cases District Court hears. However, any efficiency gained by attempting to implement such a system for Superior Court felony cases might be more than offset by an increase in appeals claiming that self-selected interpreters were not qualified. Conversely, the care that Superior Court's Office of Interpreter Services puts into finding the best possible interpreter for each hearing may be an unnecessary use of resources for District Court cases such as name change hearings or contested infractions. Finally, participants also expressed reluctance at having interpreters for PAO consolidated into the court system because of the difficulty in maintaining the appearance of impartiality if resources are allocated from a single source in an adversarial system.

In addition to these challenges, it is unlikely that a consolidated system of providing interpreter services would result in significant savings. While it is possible that there would be marginal savings in overhead costs in a consolidated interpreter office, there is no indication that demand for interpretation services would decrease due to consolidation.

Workgroup members also felt that there are strengths to the current system which could be lost through consolidation. At present, agencies are able to meet their own unique needs and develop service standards that recognize their operating requirements. For example, state certification ensures the quality of interpreters in District Court and Superior Court, while DAJD and KCSO reduce their need for outside interpretation by recruiting and maintaining bilingual staff. In addition, the Courts, PAO, and DPH all maintain their own quality control systems to ensure that the interpreters they hire provide a high level of service; it is uncertain that a consolidated interpreter service would be able to ensure that each agency's needs are being met.

Finally, workgroup participants stressed that collaboration on issues related to interpreters between agencies regularly occurs now and should be encouraged in the future. Many of the people responsible for organizing interpreter services within individual agencies have been in their positions for many years and have built extensive professional networks. These resources and contacts are frequently shared between agencies. For example, one of the greatest challenges with the provision of interpreter services reported by workgroup members is recruiting interpreters in less common languages. When attempting to recruit an interpreter in one of these languages, County staff frequently turn to their colleagues from other agencies for assistance. In addition, the AOC maintains a statewide listserv for court managers to communicate with each other in their efforts to locate interpreters.

#### IV. Recommendations

In exploring possible recommendations, the proviso workgroup searched for options that would decrease costs, improve quality, increase efficiency, or increase resource availability. Based on these criteria, the proviso workgroup identified the following recommendations.

1. **Consolidate contracts with interpretation agencies** – Several agencies including DCHS, KCSO, DAJD, and DPD procure at least some of their interpretation services from SignOn, a sign language interpretation agency, and LanguageLine (or its subsidiary, Pacific Interpreters), a telephone interpretation service. DPH currently procures service from these vendors via a state contract and has not had trouble with this process. However, other agencies have set up their own contracts and expressed frustration with the procurement process. The workgroup recommends that County agencies that do business with these vendors follow the process used by DPH and utilize existing state contractors when possible.
2. **Explore the use of video interpretation** – Changing from in-person to video interpretation where appropriate has the potential to make jobs more attractive to potential interpreters by eliminating travel time and parking, to increase interpreters' ability to provide service in multiple locations in succession, to expand the interpreter pool by making interpreters anywhere in the world available provided they have the right technology, and to perhaps reduce costs by allowing agencies to reduce their minimum payment per job.

DAJD has an active project to install video visitation capability in the County's adult jails. This functionality will enable friends and family members, as well as defense attorneys, to visit with inmates via video. Video kiosks will be available at the jails, but the intent is to also enable visiting from sites other than the jail, such as attorney's offices. As part of the video visitation project, DAJD is exploring the possibility of three-way visitation, which would enable interpreters to participate in the video visits. Three-way communication is not currently available using the telephone system due to concerns that it would enable inmates to violate no-contact orders and these concerns would need to be addressed in the video visitation project and may be insurmountable. The successful implementation of video visitation will expose criminal justice participants to the technology and allow them to better assess its potential impact on court matters.

In addition to technical considerations, there are policy issues that will likely prevent the widespread use of video interpretation. Not all matters are appropriate for video interpretation and criminal justice partners would have to collectively agree on when in-person interpretation is needed and when video interpretation would suffice. It is also likely that some judges will not allow video interpretation in their courtrooms and public defenders are likely to object if they feel the arrangement puts their client at a disadvantage.

Nonetheless, the workgroup felt that it was worth exploring the logistical and technical issues with King County Information Technology (KCIT) to see if it would be possible to set up systems that could be used for video interpretation at minimal cost. If the technical obstacles to video

interpretation can be overcome, the next step would be for criminal justice agencies to develop protocols for when video interpretation may be used in lieu of in-person interpretation. AOC has experience in video interpretation and may be able to serve as a resource in these efforts.

3. **Improve DPD processes for managing interpreters' time** – Some workgroup members expressed concerns that at times interpreters for DPD client interviews were being released well short of the two-hour minimum for which they were being paid. In its ongoing efforts to establish consistent, efficient practices throughout the organization, DPD has committed to improving its own processes to ensure that interpreters requested for client interviews are fully utilized.
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