

**PROFESSIONAL LICENSURE DIVISION[645]**

**Notice of Intended Action**

**Proposing rule making related to licensure and providing an opportunity for public comment**

The Board of Sign Language Interpreters and Transliterators hereby proposes to amend Chapter 361, “Licensure of Sign Language Interpreters and Transliterators,” Iowa Administrative Code.

*Legal Authority for Rule Making*

This rule making is proposed under the authority provided in Iowa Code sections 147.76, 154E.2 and 272C.2.

*State or Federal Law Implemented*

This rule making implements, in whole or in part, Iowa Code section 154E.2.

*Purpose and Summary*

The proposed amendments add videoconferencing and remote services in the definition of interpreter or transliterator services, update the requirements for licensure to include submission of online applications and online payment, clarify that official documentation of passing an approved examination or of current certification of an accepted certification is required for licensure, and add an advanced certification awarded by the Board for Evaluation of Interpreters to the certifications accepted for licensure. License reactivation requirements will be expanded to include current verification of competence based on passing an examination or presenting current certification. The proposed amendments also add requirements for temporary licensure, including passing one of the accepted examinations or successful completion of an interpreter training program from a regionally accredited college or university, and submission of a written supervisory agreement with the application for a temporary license.

*Fiscal Impact*

This rule making has no fiscal impact to the State of Iowa.

*Jobs Impact*

After analysis and review of this rule making, no impact on jobs has been found.

*Waivers*

A waiver provision is not included in this rule making because all administrative rules of the professional licensure boards in the Professional Licensure Division are subject to the waiver provisions accorded under 645—Chapter 18.

*Public Comment*

Any interested person may submit written comments concerning this proposed rule making. Written comments in response to this rule making must be received by the Board no later than 4:30 p.m. on August 31, 2021. Comments should be directed to:

Sharon Dozier  
Professional Licensure Division  
Iowa Department of Public Health  
Lucas State Office Building  
321 East 12th Street  
Des Moines, Iowa 50319  
Email: [sharon.dozier@idph.iowa.gov](mailto:sharon.dozier@idph.iowa.gov)

### *Public Hearing*

A public hearing at which persons may present their views orally or in writing will be held as follows:

August 31, 2021  
10 to 11 a.m.

Fifth Floor Board Conference Room 526  
Lucas State Office Building  
Des Moines, Iowa  
Via videoconference:  
[us02web.zoom.us/j/88660497606?pwd=NUVITUFkdS9BTec2cE5GZXNuSThzdz09](https://us02web.zoom.us/j/88660497606?pwd=NUVITUFkdS9BTec2cE5GZXNuSThzdz09)

Persons who wish to make oral comments at the public hearing may be asked to state their names for the record and to confine their remarks to the subject of this proposed rule making. In an effort to ensure accuracy in memorializing a person's comments, a person may provide written comments in addition to or in lieu of oral comments at the hearing.

Any persons who intend to attend the public hearing and have special requirements, such as those related to hearing or mobility impairments, should contact the Board and advise of specific needs.

### *Review by Administrative Rules Review Committee*

The Administrative Rules Review Committee, a bipartisan legislative committee which oversees rule making by executive branch agencies, may, on its own motion or on written request by any individual or group, review this rule making at its [regular monthly meeting](#) or at a special meeting. The Committee's meetings are open to the public, and interested persons may be heard as provided in Iowa Code section 17A.8(6).

The following rule-making actions are proposed:

ITEM 1. Amend rule **645—361.1(154E)**, definitions of "Active interpreter or transliterator services" and "Direct supervision of a temporary license holder," as follows:

*"Active interpreter or transliterator services"* means the actual time spent personally providing interpreting or transliterating services or providing interpreting or transliterating services through videoconferencing or remotely. When in a team interpreting situation, the time spent monitoring while the team interpreter is actively interpreting shall not be included in the time spent personally providing interpreting or transliterating services.

*"Direct supervision of a temporary license holder"* means monitoring of interpreting or transliterating services while personally observing the temporary license holder providing those services, as outlined in paragraphs ~~361.3(3)"b"~~ 361.3(4)"b" and "c."

ITEM 2. Amend rule 645—361.2(154E) as follows:

#### **645—361.2(154E) Requirements for licensure.**

**361.2(1)** The following criteria shall apply to licensure:

*a.* The applicant shall complete a board-approved application ~~packet~~. Application forms may be obtained from the board's website ([www.idph.iowa.gov/licensure](http://www.idph.iowa.gov/licensure)) or directly from the board office. ~~All applications shall be sent to Board of Sign Language Interpreters and Transliterators, Professional~~

~~Licensure Division, Fifth Floor, Lucas State Office Building, Des Moines, Iowa 50319-0075. The applicant may complete the application online at [ibplicense.iowa.gov](http://ibplicense.iowa.gov).~~

~~b. The applicant shall complete the application form according to the instructions contained in the application. If the application is not completed according to the instructions, the application will not be reviewed by the board until properly completed.~~

~~c. Each application shall be accompanied by the appropriate fees payable by check or money order. The application fee shall be paid prior to issuance of license. The preferred payment method is by debit card, credit card, or check or money order made to the Board of Sign Language Interpreters and Translitterators. The fees are nonrefundable.~~

~~d. No application will be considered by the board until the applicant successfully official documentation is received to establish that the applicant meets one of the following requirements:~~

~~(1) Passes the National Association of the Deaf/Registry of Interpreters for the Deaf (NAD/RID) National Interpreter Certification (NIC) examination after November 30, 2011; or~~

~~(2) Passes one of the following examinations administered by the Registry of Interpreters for the Deaf (RID):~~

~~1. Oral Transliteration Certificate (OTC); or~~

~~2. Certified Deaf Interpreter (CDI); or~~

~~(3) Passes the Educational Interpreter Performance Assessment (EIPA) with a score of 3.5 or above after December 31, 1999; or~~

~~(4) Passes the Cued Language Transliterator National Certification Examination (CLTNCE) administered by The National Certifying Body for Cued Language Translitterators; or~~

~~(5) Currently holds one of the following NAD/RID certifications awarded through November 30, 2011, by the National Council on Interpreting (NCI):~~

~~1. National Interpreter Certification (NIC); or~~

~~2. National Interpreter Certification Advanced (NIC Advanced); or~~

~~3. National Interpreter Certification Master (NIC Master); or~~

~~(6) Currently holds one of the following certifications previously awarded by the RID:~~

~~1. Certificate of Interpretation (CI); or~~

~~2. Certificate of Transliteration (CT); or~~

~~3. Certificate of Interpretation and Certificate of Transliteration (CI and CT); or~~

~~4. Interpretation Certificate/Transliteration Certificate (IC/TC); or~~

~~5. Comprehensive Skills Certificate (CSC); or~~

~~(7) Currently holds one of the following certifications previously awarded by the National Association of the Deaf (NAD):~~

~~1. NAD III (Generalist); or~~

~~2. NAD IV (Advanced); or~~

~~3. NAD V (Master); or~~

~~(8) Currently holds an advanced certification awarded by the Board for Evaluation of Interpreters (BEI).~~

~~e. It is the responsibility of the applicant to make arrangements to take the examination and have the official results submitted directly to the Board of Sign Language Interpreters and Translitterators.~~

~~361.2(2) Licensees who were issued their licenses within six months prior to the renewal shall not be required to renew their licenses until the renewal cycle two years later.~~

~~361.2(3) Incomplete applications that have been on file in the board office for more than two years shall be considered invalid and shall be destroyed.~~

~~361.2(4) An applicant who has relocated to Iowa from a state that did not require licensure to practice the profession may submit proof of work experience in lieu of educational and training requirements, if eligible, in accordance with rule 645—19.2(272C).~~

ITEM 3. Amend rule 645—361.3(154E) as follows:

**645—361.3(154E) Requirements for temporary license.**

~~**361.3(1)** An applicant for licensure who has not successfully completed one of the board-approved examinations or does not hold an approved certification set forth in paragraph 361.2(1) “d” but has complied with all other requirements in paragraphs 361.2(1) “a” to “e” shall be issued a temporary license to practice interpreting that shall be valid for two years from initial issue date. A temporary license holder may renew a temporary license once for the immediately following two-year period. and submits the online application and fee for a temporary license shall cause documentation to be submitted from the examination program to the board that verifies the applicant has passed one of the following:~~

- ~~a. The written portion of the Registry of Interpreters for the Deaf (RID) examination;~~
- ~~b. The written portion of the Board for Evaluation of Interpreters (BEI) examination;~~
- ~~c. The written portion of the Educational Interpreter Performance Assessment (EIPA) examination;~~
- ~~d. The EIPA prehire examination at the highest recommended level; or~~
- ~~e. The requirements for completion of a formal interpreter training program (ITP) accredited by a college or university. An official transcript shall verify completion.~~

~~**361.3(2)** An applicant for a temporary license shall submit a written supervisory agreement that complies with the requirements stated in subrule 361.3(4). The temporary license shall be valid for two years from the initial issue date. A temporary license holder may renew a temporary license once for the immediately following two-year period.~~

~~**361.3(2) 361.3(3)** An applicant who is issued a temporary license is subject to the same requirements as those required of a licensed interpreter or transliterator set forth in Iowa Code chapters 154E and 147 and 645—Chapters 361 to 363.~~

~~**361.3(3) 361.3(4)** A temporary license holder is only authorized to practice if the following direct supervision requirements are fulfilled. A temporary license holder must:~~

~~a. Enter into a written agreement with a supervisor in which the temporary license holder and the supervisor agree to the minimum requirements provided in paragraphs ~~361.3(3) “b”~~ 361.3(4) “b” and “c.” The supervisor shall possess a full, unrestricted sign language interpreter and transliterator license. The agreement shall be signed and dated by the temporary license holder and the supervisor; shall include the temporary license holder’s and supervisor’s names, addresses and contact information; and shall be provided to the board ~~upon request~~ with the application for a temporary license.~~

~~b. Have a supervisor observe the temporary license holder in active practice for no fewer than six bimonthly observation sessions per year at events lasting at least 30 minutes each, if the temporary license holder is working alone in providing active interpreter or transliterator services, or at least 60 minutes each, if the temporary license holder is working in a team interpreting situation. At least two of the observation sessions must be in person, and the remainder of the observation sessions may be performed through technology that allows direct observation of the temporary license holder providing active interpreter or transliterator services.~~

~~c. Attend at least six bimonthly advisory sessions with the supervisor per year for the purpose of discussing the supervisor’s suggestions for the temporary license holder’s professional skill development based on the observation sessions. An advisory session may occur immediately following an observation session if the setting is appropriate. At least two of the advisory sessions must be in person and the remainder of the advisory sessions may be performed through technology that allows real-time assessment and feedback. Each advisory session shall involve only the temporary license holder and supervisor.~~

~~d. Maintain an event log documenting the date, time, length and setting of each observation session and advisory session and whether the session was performed in person or through other technological means. The temporary license holder shall ensure that the supervisor verifies the occurrence of the observation session or advisory session by placing the temporary license holder’s signature on the log prior to submission to the supervisor. This event log shall be provided to the board upon request and must be submitted with the temporary license holder’s renewal application.~~

~~e. Ensure that the supervisor attends each of the observation sessions and advisory sessions or reschedules the sessions as necessary to ensure compliance.~~

f. Comply with the required observation session and advisory session obligations. If for any reason the replacement of a supervisor becomes necessary, the temporary license holder shall be responsible for developing a new written agreement with the new supervisor. A replacement of supervisors shall not excuse noncompliance with observation session and advisory session obligations.

g. Obtain permission from clients as necessary to allow the supervisor to be in attendance during the observation sessions.

~~361.3(4)~~ 361.3(5) As an Iowa-licensed practitioner in accordance with this chapter, a supervisor providing direct supervision of a temporary license holder as provided in subrule ~~361.3(3)~~ 361.3(4) is obligated to report to the board an interpreter or transliterator temporary license holder who is not complying with direct supervision requirements or who is not practicing in compliance with Iowa law and rules including, but not limited to, Iowa Code chapter 154E and 645—Chapters 361 to 363.

ITEM 4. Amend rule 645—361.9(17A,147,272C) as follows:

**645—361.9(17A,147,272C) License reactivation.** To apply for reactivation of an inactive license, a licensee shall:

**361.9(1)** Submit a reactivation application on a form provided by the board.

**361.9(2)** Pay the reactivation fee that is due as specified in 645—subrule 5.18(9).

**361.9(3)** Provide verification of current competence to practice sign language interpreting or transliterating by satisfying one of the following criteria:

a. If the license has been on inactive status for five years or less, an applicant must provide the following:

(1) Verification of the license(s) from every jurisdiction in which the applicant is or has been licensed and is or has been practicing during the time period in which the Iowa license was inactive sent directly from the jurisdiction(s) to the board office. Web-based verification may be substituted for verification from a jurisdiction's board office if the verification includes:

1. The licensee's name;
2. The date of initial licensure;
3. Current licensure status; and
4. Any disciplinary action taken against the license; and

(2) Verification of completing 40 hours of continuing education within two years of the application for reactivation; and

(3) Verification of a current certification as identified in subrule 361.2(1), or of passing an examination identified in subrule 361.2(1), which was passed after the license became inactive.

b. If the license has been on inactive status for more than five years, an applicant must provide the following:

(1) Verification of the license(s) from every jurisdiction in which the applicant is or has been licensed and is or has been practicing during the time period in which the Iowa license was inactive sent directly from the jurisdiction(s) to the board office. Web-based verification may be substituted for verification from a jurisdiction's board office if the verification includes:

1. The licensee's name;
2. The date of initial licensure;
3. Current licensure status; and
4. Any disciplinary action taken against the license; and

(2) Verification of completion of 80 hours of continuing education within two years of application for reactivation; and

(3) Verification of a current certification as identified in subrule 361.2(1), or of passing an examination identified in subrule 361.2(1), which was passed after the license became inactive.



Dozier, Sharon &lt;sharon.dozier@idph.iowa.gov&gt;

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**ARC 5821C: Comments for Chapter 361 - Interpreter/Transliterator license**

1 message

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**Amber Tucker** <artucker2930@gmail.com>  
To: sharon.dozier@idph.iowa.gov

Tue, Aug 31, 2021 at 11:08 AM

Hello,

Please submit for the record the following comments in response to the proposed changes to Chapter 361 regarding licensure for Sign Language Interpreters & Transliterators:

Under the definition of "*active interpreter or transliterator services*", does the addition of VRI interpreting apply to (1) interpreters physically located in Iowa and providing VRI services to consumers also located in Iowa, (2) interpreters physically located in Iowa and providing VRI services to consumers located in other states, (3) interpreters physically located in other states but providing services to consumers in Iowa, or all of the above? Other states have requirements for either interpreters or VRI companies to hold a license in their state in order to provide services to the consumers in their state. Especially due to the increase in use of VRI services during the pandemic, interpreters are providing services to consumers who live in other states. Since the purpose of this licensure is to protect the wellbeing of Iowans, will it apply to interpreters regardless of where they reside?

361.2(4) - This exception is unnecessary. The interpreter should apply for a temporary license and take one of the approved exams/assessments to demonstrate their ability to provide quality, professional, ethical interpreting services. Work history is not enough to demonstrate current ability to do the actual provision of services. All licensed interpreters who work in Iowa should be held to the same standard, and certainly residents of Iowa should not be held to a higher standard than people who have lived in an unlicensed state and have never had to prove their ability to do the work. The purpose of licensure is to have an objective determination of qualification based on valid and reliable third party assessments. The Board members are not qualified in the assessment and rating of interpreters skill in the same manner that the entities who host the approved assessments are. This provision should be removed.

361.2(1)d(3) - The EIPA does not use "pass/fail" terminology. Better phrasing would be "Receives a score of 3.5 or higher".

I support the addition of requirements to obtain a temporary license. This provides protections for Iowans who use interpreting services and brings the rules into closer alignment with the purpose of licensure. This is a much needed step, and I applaud and thank the Board for making this addition.

Thank you for considering my comments.

Amber Tucker  
Iowa Interpreter/Transliterator license 00090

To:  
Iowa Board of Sign Language Interpreters and Transliterators

From:  
Deborah Cates, Ph.D.

Re:  
ARC 5821C Public Comment

I am writing in response to the proposed rule changes for the Iowa sign language interpreter and transliterator license. I am a licensed interpreter in Iowa, I have a Ph.D. in linguistics, I sit on the boards of the TASK-12 Project and the National Association of Interpreters in Education, and I am the Sign Language Program Coordinator at the Iowa School for the Deaf. I am also a nationally recognized interpreter trainer for interpreters in education, as well as having an active research program. Two of my publications this year pertain to the qualifications of sign language interpreters working in schools. I am submitting comments as a private citizen, and offer the information above only to establish my credentials.

I support the addition of the Board for Evaluation of Interpreters (BEI) advanced certification for Iowa licensure, as that brings Iowa's requirements in line with many other states (<https://naiedu.org/state-standards/>). This addition also provides safeguards against the loss of certification opportunity that comes with the Registry of Interpreters for the Deaf (RID) exam moratoriums.

I support the addition of a knowledge, skill, or training requirement for interpreters seeking a temporary license. This practice will also bring us in line with the requirements in many other states. It will also ensure that Deaf consumers will receive higher quality services from temporarily licensed interpreters. This is particularly critical in PK-12 settings where many temporarily licensed interpreters get their first work experience (Cogen & Cokely, 2015), especially because research shows that interpreters with an EIPA score of 3.0 likely do not provide educational benefit to students (Cates & Delkamiller, in press). I also support the requirement that applicants have a written agreement with a mentor prior to receiving their temporary license, especially since even an interpreter with an EIPA score of 3.5 is not recommended to work without supervision (Schick et al., 2006).

I STRONGLY encourage the addition of a provision for a test of ASL language proficiency as another option for a temporarily licensed interpreter. This would allow heritage language users of ASL and those who have studied the language in school or learned it in the community to obtain a temporary license while they seek additional training in interpreting. Research shows that a lack of ASL proficiency has a strong negative impact on interpreter skill as measured by the EIPA, and that there is very little difference between graduates and non-graduates of interpreter training programs on specific ASL language skills (Cates, 2021). The Sign Language Proficiency Interview (SLPI:ASL) and the American Sign Language Proficiency Interview (ASLPI) are both standardized, nationally recognized exams of ASL proficiency. They are less

expensive than written knowledge tests, do not require prior education to take them, and they can both be taken online from anywhere. Furthermore, Iowa School for the Deaf has a SLPI assessment team that can provide the exam free of charge to applicants for interpreter positions in schools. This would relieve some of the burden on school districts needing to hire interpreters. Based on my familiarity with both exams, and the correlation between language proficiency as measured by these exams and EIPA scores interpreters obtain with them (from my unpublished data), I recommend a SLPI:ASL level of Intermediate or higher or an ASLPI level 3 or higher. I recommend adding both options to the rule.

One additional change to the rules that I support but that has not been proposed at this time is a gradual increase in the requirement for interpreters licensed by the EIPA. When licensure was initially adopted, the EIPA requirement was set at a 3.5. This allows interpreters to work in any sector in the state, including education. *However, the creators of the EIPA stipulate that an interpreter is not qualified to work without supervision from a more skilled interpreter until they have achieved a 4.0 or higher on the EIPA (Schick et al., 2006).* Furthermore, the National Association of Interpreters in Education stipulate that interpreters working in schools should have an EIPA score of 4.0 or higher (NAIE, 2019), which is supported by recent research looking at the impact of interpreter skill on student learning outcomes (Cates & Delkammer, in press). Due to the lack of training opportunities in the state, and to the limited number of interpreters achieving a 4.0 on the EIPA in Iowa on an annual basis (3 in 2021, 2 in 2020, 1 in 2018, 1 in 2017), I do not support a complete adoption of a 4.0 as the minimum standard for licensure at this time. However, I do support a five-year re-test for interpreters with an EIPA 3.5-3.9 to ensure they are maintaining their skills at a minimum and to provide additional incentive for them to work toward an EIPA 4.0 or national certification. Another alternative would be a gradual increase in the requirement for licensure by the EIPA over the next ten years to give programs in Iowa an opportunity to get established and to support the growth of interpreters towards that higher standard. Other states have such rules already in place attached to their state licenses (<https://naiedu.org/state-standards/>).

I do have some additional considerations that the licensure board should take into account when the rule passes. They should be prepared to address these considerations when contacted by constituents:

- 1) The BEI and EIPA written tests are not currently proctored in Iowa. This means interpreters would have to go out of state to take either one of these exams, though the EIPA written test could be brought to Iowa through the TASK-12 project. However, that would require additional fees from the state of Iowa paid to the TASK-12 project, and that exam would only be offered twice per year (October and March).
- 2) The EIPA pre-hire assessment is only available to the hiring agency, not to interpreter applicants directly. Therefore, the burden of this option falls to hiring agencies.
- 3) The language around the interpreter training program completion is broad. There are a variety of interpreter training programs with a variety of requirements in course selection, program length, and type of degree awarded upon completion. If someone has completed coursework but not a degree, which coursework is required to satisfy this



education requirement? Is coursework without a degree acceptable? Is a 9-month certificate program treated the same as a four-year degree program?

Thank you for the opportunity to comment on these rule changes.

Deborah Cates, Ph.D.

References:

Cates, Deborah Michele (2021) "Patterns in EIPA Test Scores and Implications for Interpreter Education," *Journal of Interpretation*: Vol. 29 : Iss. 1 , Article 6. Available at: <https://digitalcommons.unf.edu/joi/vol29/iss1/6>

Cates, D. M., & Delkamiller, J. (in press). Impact of sign language interpreter skill on education outcomes [Manuscript submitted for publication]. Iowa School for the Deaf.

Cogen, C., & Cokely, D. (2015). Preparing interpreters for tomorrow: Report on a study of emerging trends in interpreting and implications for interpreter education. National Interpreter Education Center.  
[http://www.interpretereducation.org/wpcontent/uploads/2016/02/NIEC\\_Trends\\_Report\\_2\\_2016.pdf](http://www.interpretereducation.org/wpcontent/uploads/2016/02/NIEC_Trends_Report_2_2016.pdf)

National Association of Interpreters in Education (2021, January 1). State Requirements for Educational Interpreters. <https://naiedu.org/state-standards/>

National Association of Interpreters in Education. (2019). *Professional Guidelines for Interpreting in Educational Settings* (1st ed.). Retrieved from [www.naiedu.org/guidelines](http://www.naiedu.org/guidelines).

Schick, B., Williams, K., & Kupermintz, H. (2006). Look who's being left behind: Educational interpreters and access to education for deaf and hard-of-hearing students. *Journal of Deaf Studies and Deaf Education*, 11(1), 3-20. <https://doi:10.1093/deafed/enj007>



Dozier, Sharon &lt;sharon.dozier@idph.iowa.gov&gt;

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**Comments for Chapter 361 - Interpreter/ Transliterator**

1 message

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**ISRID President** <isridpresident@gmail.com>

Tue, Sep 14, 2021 at 7:18 AM

To: "sharon.dozier@idph.iowa.gov" &lt;sharon.dozier@idph.iowa.gov&gt;

Hello,

Please submit for the record the following comments dated August 31st, 2021, in response to the proposed changes to Chapter 361 regarding licensure for Sign Language Interpreters & Transliterators:

My name is Tara von Walden. I am a sign language interpreter, small business owner, voter, and President of Iowa State Registry of Interpreters for the Deaf.

I would like to start with a thank you for your service and offer support in ways that assure quality standards for interpreters practicing in the state of Iowa. Furthermore I support your role on the macro level to protect the consumer, namely, Deaf consumers who rely on these services for their life and liberties.

In part the impetus behind the origination of the Iowa License for Sign Language Interpreters was to increase the quality of K12 educational interpreting services across the state. Due to a variety of factors K12 students relying on interpreting services still largely lag behind their hearing peers. Due to the continued lag I feel the current standards and expectations of interpreters are not stringent enough. My recommendation is to continue to allow a 3.5 as a ticket to the permanent license with a graduated increase to a 4.0 within five years of obtaining a permanent license. In addition I believe there is value in retesting/recertifying practitioners every seven to ten years. I do support the additional requirements to obtain a temporary license outlined by the board. The Iowa State Registry of Interpreters for the Deaf (ISRID) Board feels this provides protections for Iowans who use interpreting services and brings the rules into closer alignment with the purpose of licensure. This is a much needed step, and I and the ISRID Board applaud and thank the Licensing Board for making this addition.

As noted the EIPA provides a proficiency score; the BEI awards differing proficiency levels. Stakeholders are not always aware of the difference in temporary and permanent licenses nor are they aware of differing proficiency levels. It is my recommendation that the Board recognizes and makes clear determination for all stakeholders which assignments/settings an interpreter/transliterator may accept based on their proficiency levels (as do many states).

Under the definition of "*active interpreter or transliterator services*", will the addition of VRI interpreting apply to interpreters physically located in other states but providing services to consumers in Iowa? We have witnessed an increase in use of VRI services during the pandemic, interpreters are providing services to consumers who live in other states. Since the purpose of this licensure is to protect the wellbeing of Iowans, will it apply to interpreters regardless of where they reside and how can this be proactively enforced?

Thank you for considering my comments,  
Tara von Walden

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ISRID President  
isridpresident@gmail.com