

**From:** [Donna Bos](#)  
**To:** [ADMcomment](#)  
**Subject:** ADM File No. 2018-06  
**Date:** Thursday, February 28, 2019 10:09:30 PM

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ADM File No. 2018-06  
Proposed Amendment of Rule 1.111 and Rule 8:127

I am writing to express my support of the proposed changes to the aforementioned Rules.

Regarding proposed changes to Rule 1.111, I am a certified court interpreter (Spanish) and have been since May 2010. After passing the written exam, I worked hard to become certified. The time and study invested in preparing for the exam made me a better interpreter.

From what I see in the list of Qualified Interpreters, many of them passed the written exam several years ago. Some of them passed the written exam as far back as 2007-2009. This was over 12 years ago! Many interpreters on the Qualified list have never attempted to take any portion of the oral exam, to see if they could become certified. Some of the Qualified interpreters could probably pass the oral exam if they would just go take it. They don't attempt to take the oral exam, however, because they can get by without doing so. They continue to get work in the courts without any real effort to improve their skills and demonstrate a minimum level of competency. It is easy to become complacent and accept status quo. Many of them had never even taken the written exam until changes in the court rule in 2013 motivated them to do so.

Passing the written exam (all questions are in English) to be considered a "Qualified Interpreter" only proves proficiency in English. It does not demonstrate the interpreter's ability to correctly interpret to and from a language other than English. Any attorney in Michigan should be able to pass the written English exam and be considered "Qualified" regardless of whether or not the attorney speaks another language in addition to English.

I believe amending the court rule to require all foreign language interpreters on the Qualified list to take and **pass the Consecutive segment** of the oral exam is necessary to improve the quality of interpreters in our courts. It will motivate them to work towards being fully certified. The three-part oral exam most of us took was indeed very hard to pass - all 3 parts in one sitting. Making the requirement to take one part of the exam, the consecutive mode, which is the easiest of the three, will help interpreters see they can work to achieve certification. It will also demonstrate to the courts that interpreters are serious about their work as an interpreter and are willing to invest time and effort in their profession. Once they pass the consecutive part of the oral exam, they can work on passing another section, and thus be actively engaged in becoming fully certified. This will improve the overall quality of court interpreters. Michigan courts will benefit from the knowledge that 3rd-party exam graders have evaluated the interpreter's ability and have determined the interpreter meets minimum standards of accuracy in interpretation.

Regarding proposed changes to Rule 8.127, I support this amendment as well. As long as the registered interpreters are given ample notice that the annual registration is due Sept. 1 instead of Sept. 30 there should be no problem in submitting the paperwork on time. In the past, the paperwork was due by Sept. 30, but the interpreter id cards expired on the 30th. Interpreters did not receive the new cards until some time in October. The proposed change to the due date

facilitates processing the paperwork and issuing new interpreter certification/qualification cards by Oct. 1.

I strongly recommend the changes to Rule 1.111 and Rule 8.127 be adopted.

Respectfully submitted,

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