Judicial Council *of* California

COURT INTERPRETERS ADVISORY PANEL
MINUTES OF OPEN MEETING

September 3, 2026

12:15 p.m. - 1:15 p.m.

Virtual

Members Present: Hon. Maurice Sanchez. (Chair), Ms. Anabel Romero (Vice-Chair), Mr. Hany Farag, Mr. José Navarrete, Ms. Anabel Romero, Hon. Tamara Hall, Ms. Jennifer De La Cruz, Ms. Angie Birchfield, Ms. Stephanie Cameron, Ms. Bonnie Faye Gibson-Brydon, Ms. Shirley Luo, Hon. Michael P. Pulos, Bryan Kritzeck

Members Absent: Ms. Mary Ma

Others Present: Mr. Ray Mata, Ms. Angela De Leon, Mr. Douglas Denton

OPEN MEETING

Call to Order and Roll Call
The chair called the meeting to order at 12:15 p.m. and took roll call.

Approval of Minutes
The advisory body reviewed and approved the minutes of the July 30, 2026, Court Interpreters Advisory Panel meeting.

DISCUSSION AND ACTION ITEMS (ITEMS 1–1)

Item 1
Draft 2027 CIAP Annual Agenda (Action Required)
Mr. Ray Mata, Analyst, Court Interpreters Program, gave CIAP gave a presentation reviewing its draft 2027 CIAP Annual Agenda.

Members had no questions regarding the presentation. One member requested that court mentorship be considered as a potential discussion item for the 2028 annual agenda.

Action: The voting members of CIAP unanimously voted to approve the 2027 Annual Agenda.

ADJOURNMENT

There being no further business, the meeting was adjourned at 1:15 p.m.

Approved by the advisory body on enter date.

Judicial Council of California

455 Golden Gate Avenue · San Francisco, California 94102-3688
courts.ca.gov

REPORT TO THE JUDICIAL COUNCIL

Item No.: xx

For business meeting on December 1, 2026

Court Interpreters: Revised Credential Review Procedures

Judicial Council Report Details

Rules, Forms, Standards, or Statutes Affected
None

Effective Date
January 1, 2026

Recommended by
Hon. Tamara Hall, Chair
Anabel Romero, Vice-Chair
Court Interpreters Advisory Panel

Date of Report
October 15, 2026

Contact
Ray A. Mata, Analyst, 916-643-6955
ray.mata@jud.ca.gov

Report Type
Action Required

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Executive Summary

The Court Interpreters Advisory Panel proposes amendments to the *California Court Interpreter Credential Review Procedures* to establish a standardized, diagnostic skills assessment for substantiated concerns about interpreting performance and to provide disciplinary letters as an intermediate response to substantiated misconduct. The revisions give the Judicial Council's Court Interpreters Program a more structured way to evaluate skills and respond proportionately to concerns affecting a statewide credential.

Recommendation

The Court Interpreters Advisory Panel (CIAP) recommends that the Judicial Council approve the following revisions to the *California Court Interpreter Credential Review Procedures*, effective January 1, 2027:

- Establish a standardized, third-party skills assessment when credential review identifies a substantiated interpreting-skills concern that warrants assessment;
- Authorize a disciplinary letter for substantiated concerns that warrant discipline but do not rise to suspension or revocation, with an interpreter's choice to accept the letter and forgo an Office of Administrative Hearings (OAH) hearing or request OAH review and determination;
- Clarify that the same substantive threshold and procedural protections apply across credentialed languages, and that the Judicial Council will make every effort to develop assessments in every certified language as resources become available; and
- Prohibit retaliation for good-faith participation in the credential review process, subject to applicable law and Judicial Council authority.

The proposed revised credential review procedures are attached at pages 326-342.

Analysis/Rationale

Government Code section 68562(d) authorizes the Judicial Council to establish standards and procedures for court interpreter certification and registration. The existing *California Court Interpreter Credential Review Procedures*, adopted in 2020, govern allegations involving certified and registered spoken-language court interpreters on the Judicial Council Master List. They permit investigation and formal discipline, including proceedings before OAH, but historically did not provide a standardized diagnostic method for evaluating skills-based complaints or a clearly defined intermediate disciplinary option.

From 2022 through 2025, the council contracted with the National Center for State Courts (NCSC) to develop and refine diagnostic tools and resources for assessing interpreters' knowledge, skills, and abilities. The proposed assessment is conducted virtually with prepared audio recordings, scripts, and scenarios reflecting typical court interactions. It is recorded and reviewed by at least two evaluators using an approved scoring rubric. It identifies skills and areas for improvement; it is not a pass/fail credentialing examination and does not by itself determine whether an interpreter retains a credential.

An assessment would be required only when the credential review process determines that one is necessary to evaluate a legitimate concern about interpreting skills. The interpreter receives notice of the concern and an opportunity to respond, and the determination requires supporting evidence. Results are considered with the other evidence gathered in the investigation and may lead to training or other appropriate measures. The revised procedures would also distinguish skill deficiencies from isolated errors associated with rapid or overlapping speech, poor audio, or other courtroom conditions.

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The Court Interpreters Program (CIP) receives approximately 12 complaints annually through credential review. A disciplinary letter would provide an intermediate option for substantiated concerns that warrant discipline but do not rise to suspension or revocation. To address public comments about a letter's effect on an interpreter's public professional record, the revised procedures would allow the interpreter to accept the letter and forgo an OAH hearing or request OAH review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution. The revised procedures would specify how this choice, any interim suspension, finality, notice, and public Master List posting operate together.

Policy implications

Credential review addresses the statewide credential. Trial courts continue to address employment matters under their applicable personnel policies, collective bargaining agreements, representation rights, grievance procedures, and due process requirements. The proposal does not change the substantive standards in California Rules of Court, rule 2.890. It provides additional procedures and proportionate responses when concerns involving existing interpreting standards are substantiated. These procedures apply to certified and registered court interpreters who hold a Judicial Council credential; oversight of non-credentialed or provisionally qualified interpreters is governed by other applicable requirements.

Comments

The Invitation to Comment, SP26-04, requested public comments by July 13, 2026. The accompanying working chart contains 72 commenter entries: two in agreement, 59 in agreement if modified, eight opposed, and three stating no indicated position. Many submissions raised overlapping concerns. The chart provides individual responses; the principal themes and resulting revisions are summarized here.

Commenters questioned whether disciplinary letters could be publicly posted without an OAH hearing or independent review. The Court Interpreters Advisory Panel (CIAP) proposes an election for the interpreter to accept the letter or request OAH review before the matter is resolved. Commenters also sought clearer assessment standards, safeguards against subjective results, and consideration of courtroom conditions. The NCSC-developed diagnostic process uses prepared scenarios, an approved rubric, and at least two evaluators; the results are considered with other evidence and are not independently dispositive of credential status. The revised procedures would clarify the evidence and notice required before an assessment is directed.

Commenters asked how assessment will work across languages, particularly languages of lesser diffusion, and whether an evaluator will be available. The revised procedures would provide clarification on a common substantive threshold and procedural protections regardless of language, while the council makes every effort to develop assessment capacity in every certified language. Other commenters raised concerns about represented employees and non-credentialed interpreters. CIAP explains that credential review and trial court employment discipline address different interests and that non-credentialed interpreters fall outside these credential-specific

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procedures. In response to comments about retaliation, CIAP proposes adding narrowly tailored protection for good-faith participation by reporting parties and other individuals in the credential review process.

The comment chart also records an individual comment outside the scope of SP26-04.

Alternatives considered

No alternatives were considered. The *California Court Interpreter Credential Review Procedures* document has not been updated since its adoption by the council in 2020 and does not reflect current practices or recent developments, such as the creation of a standardized skills assessment process to address skills-based complaints. CIAP included this update as a project on its annual agenda, and the proposed amendments are necessary to formally incorporate the skills assessment and disciplinary letter processes into the procedures.

Fiscal and Operational Impacts

The proposal is expected to have minimal fiscal or operational impact on courts, since most of the updates expand upon the existing council process for evaluating complaints. Some additional training for court staff may be required, especially for handling and processing interpreter complaints when court input is necessary under the revised procedures. These impacts are anticipated to be limited and are likely to be offset by improved training, greater efficiency, more consistent outcomes, and a reduced need for lengthy investigations or formal proceedings. Initially, skills assessments will be available for Spanish only; however, as capacity allows, additional trained evaluators for other languages may be added. Funding for the skills assessment process will come from the Judicial Council Language Access Services program budget and will be supported by neutral third-party evaluators selected by the council. Strengthening the credential review process will enhance public protection, preserve the integrity of the court interpreter profession, and support timely identification and resolution of interpreter performance issues.

Attachments and Links

1. Cal. Rules of Court, rule 2.890, www.courts.ca.gov/cms/rules/index.cfm?title=two&linkid=rule2_890
2. Chart of comments, at pages 7-313
3. Attachment A: *California Court Interpreter Credential Review Procedures* (January 2020), https://languageaccess.courts.ca.gov/sites/default/files/partners/default/2023-12/CIP_CRProcedures.pdf
4. Attachment B: *California Court Interpreter Credential Review Procedures* (January 2027), at pages 326-342

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Rule 2.890. Professional conduct for interpreters

(a) Representation of qualifications

An interpreter must accurately and completely represent his or her certifications, training, and relevant experience.

(Subd (a) amended effective January 1, 2007.)

(b) Complete and accurate interpretation

An interpreter must use his or her best skills and judgment to interpret accurately without embellishing, omitting, or editing. When interpreting for a party, the interpreter must interpret everything that is said during the entire proceedings. When interpreting for a witness, the interpreter must interpret everything that is said during the witness's testimony.

Subd (b) amended effective January 1, 2007.)

(c) Impartiality and avoidance of conflicts of interest

(1) *Impartiality*

An interpreter must be impartial and unbiased and must refrain from conduct that may give an appearance of bias.

(2) *Disclosure of conflicts*

An interpreter must disclose to the judge and to all parties any actual or apparent conflict of interest. Any condition that interferes with the objectivity of an interpreter is a conflict of interest. A conflict may exist if the interpreter is acquainted with or related to any witness or party to the action or if the interpreter has an interest in the outcome of the case.

(3) *Conduct*

An interpreter must not engage in conduct creating the appearance of bias, prejudice, or partiality.

(4) *Statements*

An interpreter must not make statements to any person about the merits of the case until the litigation has concluded.

(Subd (c) amended effective January 1, 2007.)

(d) Confidentiality of privileged communications

An interpreter must not disclose privileged communications between counsel and client to any person.

(Subd (d) amended effective January 1, 2007.)

(e) Giving legal advice

An interpreter must not give legal advice to parties and witnesses, nor recommend specific attorneys or law firms.

(Subd (e) amended effective January 1, 2007.)

(f) Impartial professional relationships

An interpreter must maintain an impartial, professional relationship with all court officers, attorneys, jurors, parties, and witnesses.

(Subd (f) amended effective January 1, 2007.)

(g) Continuing education and duty to the profession

An interpreter must, through continuing education, maintain and improve his or her interpreting skills and knowledge of procedures used by the courts. An interpreter should seek to elevate the standards of performance of the interpreting profession.

(Subd (g) amended effective January 1, 2007.)

(h) Assessing and reporting impediments to performance

An interpreter must assess at all times his or her ability to perform interpreting services. If an interpreter has any reservation about his or her ability to satisfy an assignment competently, the interpreter must immediately disclose that reservation to the court or other appropriate authority.

(Subd (h) amended effective January 1, 2007.)

(i) Duty to report ethical violations

An interpreter must report to the court or other appropriate authority any effort to impede the interpreter's compliance with the law, this rule, or any other official policy governing court interpreting and legal translating.

(Subd (i) amended effective January 1, 2007.)

Rule 2.890 amended and renumbered effective January 1, 2007; adopted as rule 984.4 effective January 1, 1999.

SP26-04 Chart of Comments. Court Interpreters: Revised Credential Review Procedures. All comments are verbatim unless indicated. Positions: A = Agree; AM = Agree if modified; N = Do not agree; NI = Not indicated. List of All Commenters, Overall Position on the Proposal, and General Comments.

Number	Commenter	Position	Comment	Committee Response
1.	Raffi Aftandelian Certified California Russian court interpreter; La Jolla	AM	To the Judicial Council and Court Interpreters Advisory Panel: I am a California certified Russian court interpreter and respectfully submit the following comments regarding SP26-04, Proposed Revisions to the California Court Interpreter Credential Review Procedures. I support maintaining high professional standards for court interpreters and believe that the public deserves qualified, ethical, and competent language access services. However, I have serious concerns regarding several aspects of the proposed changes. Public Disciplinary Letters Without Formal Due Process. The proposal authorizes the Court Interpreters Program (CIP) to issue disciplinary letters and publicly post the subject and terms of those letters on an interpreter's Master List record. This is concerning because a disciplinary letter could become part of an interpreter's permanent public professional record without a hearing before the Office of Administrative Hearings, without findings by an Administrative Law Judge, and without the procedural protections traditionally associated with formal discipline. A public disciplinary posting can affect an interpreter's professional reputation, future employment opportunities, and standing within the profession. Such consequences should not occur without full due process protections and independent review. Unclear Standards for Skills Assessments The proposal creates a mandatory skills assessment process but does not clearly identify the standards by which interpreters will be evaluated. California's credentialing system already establishes the qualifications necessary to become a certified or registered court interpreter. The proposal appears to create a new layer of evaluation without clearly identifying the performance standard, scoring criteria, appeal rights, evaluator accountability, or protections against subjective judgments. Court interpretation is a highly complex profession performed in real time under constantly changing conditions. Unlike a controlled testing	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter

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			environment, interpreters routinely work through background noise, overlapping speakers, poor acoustics, low-volume speakers, rapid speech, trailing words, incomplete sentences, regional accents, emotional testimony, legal terminology, terms of art, and unexpected subject matter. Judges, attorneys, witnesses, and litigants often speak at speeds significantly faster than normal conversational speech. Interpreters frequently raise concerns regarding these communication barriers and environmental impediments, yet those concerns are not always addressed before interpretation continues. Even highly skilled interpreters may occasionally encounter unfamiliar terminology, momentary word-retrieval difficulties, or difficult speech patterns. These realities are inherent in court interpretation and do not necessarily indicate incompetence. The proposal does not adequately explain how evaluators will distinguish between genuine deficiencies in an interpreter's knowledge, skills, and abilities and isolated performance issues caused by difficult courtroom conditions. Mandatory Participation and Potential Discipline The proposal states that participation in the skills assessment process is mandatory and that failure to participate may lead to suspension and possible revocation proceedings. I am concerned that an interpreter could face disciplinary consequences based on a dispute regarding participation in the assessment process itself rather than proven misconduct or incompetence. Before such authority is granted, the Judicial Council should establish clear standards, appeal rights, review procedures, and safeguards to ensure fairness and consistency. Broad Expansion of Rule 2.890 Allegations The proposal also expands the potential use of allegations under California Rule of Court 2.890. Rule 2.890 covers broad areas of professional conduct including accuracy, impartiality, confidentiality, conflicts of interest, professional demeanor, and duties to the court. As written, a wide range of alleged conduct could potentially result in disciplinary letters, corrective actions, skills assessments, retesting	on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and

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			requirements, and public disclosure before formal adjudication has occurred. Impact on Represented Employee Interpreters Many court interpreters are represented employees working under negotiated Memoranda of Understanding that contain disciplinary procedures, representation rights, grievance procedures, and due process protections. I am concerned that the proposed credential review process could be used to address issues that are already covered by existing disciplinary systems negotiated between courts and employee organizations. Credential review should not become an alternative pathway that bypasses established disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. If implementation of these procedures affects represented employees, the Judicial Council and courts should ensure that applicable meet-and-confer obligations are satisfied and that negotiated labor protections are respected. Requested Revisions I respectfully request that the Judicial Council: Remove the provision authorizing public posting of disciplinary letters that have not been adjudicated through a formal hearing process. Establish clear, objective, validated, and transparent standards for skills assessments. Provide meaningful appeal rights and independent review of assessment results. Clarify how environmental and courtroom conditions will be considered when evaluating interpreter performance. Ensure that credential review procedures do not circumvent negotiated disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. Preserve full due process protections before disciplinary actions become public. Include Union Representation in the Development and Oversight Process. The Judicial Council should include representatives of the California Federation of Interpreters and other interpreter stakeholders in the development, implementation, and ongoing review of the skills	practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). A skills assessment would not be required merely because a complaint is filed. It would be required only when the credential review process determines that an assessment is necessary to evaluate a legitimate concern regarding interpreting skills. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. No skills assessment or

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			assessment and credential review process. Conclusion Court interpreters play a critical role in protecting access to justice and meaningful participation in judicial proceedings. Any system designed to evaluate interpreter competence or impose discipline should be fair, transparent, objective, and respectful of both professional standards and due process rights. I respectfully urge the Judicial Council to revise SP26-04 before adoption. Thank you for your consideration.	disciplinary action would be imposed without supporting evidence. Once an assessment is appropriately required, participation is necessary for the Judicial Council to determine whether further action, remediation, or no action is warranted. The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. Credential review and trial court employment discipline serve distinct, though sometimes related, purposes. Trial courts remain responsible for addressing employment matters, including any applicable collective bargaining, representation, grievance, and due process requirements. These actions are focused on an interpreter's employment with the trial court. In contrast, the Judicial Council's credential review process is focused specifically on an interpreter's

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				statewide credential and its responsibility to maintain the integrity of that credential. While the same conduct may give rise to both employment-related and credentialing concerns, each process addresses a different interest and operates within its respective authority. The credential review process is not intended to replace, duplicate, or circumvent applicable employment processes or protections. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections.

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				The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.
2.	Rosendo Aguilar California Registered Court Interpreter - Mam	AM	Hi, My name is Rosendo Aguilar, I'm a registered interpreter for the Mam language and I'd like to offer the following: I believe the skills assessment should apply to all languages, not just Spanish. Stating that other languages will be added as needed just extends the disparity for credentialed interpreters. I was provisionally qualified for a number of years and not a single Court ever asked for proof that I in fact have training in the field or if I had knowledge of the code of ethics and standards; in fact I was assigned to very challenging cases and nobody has questioned the integrity of my performance. What kept making me think I didn't need to be credentialed was the money, I was making more money than certified interpreters and didn't have to spend a penny on training or annual fees, or continuing education. I believe this is wrong! The judicial council needs to come up with a way to screen individuals before they step in any Courtroom. It has come to my attention that there is a Mam interpreter working in Courts (for years now) that does not know how to read or write; that is a separate issue, but it proves that we're not meeting standards and due process is in jeopardy. Disciplinary actions should apply to anybody interpreting in Court regardless of language or credentials. Either we all get disciplined or nobody at all. Evidence to support any complaint should be required and provided to the interpreter in question. The interpreter receiving the complaint should have the ability to review the complaint, supporting evidence and should have the option to challenge it. Thank you.	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to

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				OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed

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				by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone does not establish a violation or

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				automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.

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				The committee appreciates the concern regarding equitable application across all credentialed languages. The next draft will clarify that the same substantive threshold and procedural protections apply regardless of language and that the Judicial Council will make every effort to create a skills assessment process in every certified language as some are currently in development. The Credential Review Procedures apply specifically to California certified and registered court interpreters who hold a Judicial Council-issued credential and are included on the Judicial Council Master List. Accordingly, these procedures are intended to address matters that may affect an interpreter's credential and continued eligibility to maintain that credential. Oversight of noncredentialled or provisionally qualified interpreters falls outside the scope of the Credential Review Procedures and is governed by other applicable trial court policies, Judicial Council program requirements, and related standards or procedures.
3.	Monica P. Almada CCI, Forensic Linguists' Studios	AM	To the members of the Court Interpreters Advisory Panel (CIAP) The following comments are about the revisions to the credential review process for Court Interpreters. I find several concerning points in your proposal. 1 – Regarding complaints about misconduct, evidence should be mandatory, not simply "encouraged" when available but	The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when

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			not required. Who would like to receive a misconduct complaint that lacks any evidence? If evidence is not required, this could give room for anyone to fabricate complaints. Evidence should be a requirement. 2 – If the request for a credential review meets the jurisdictional requirements, along with receiving a notice with a summary of the allegations, date of incident, interpreting assignment's case file number, the interpreter should also receive the evidence that supports the claims. 3 – On Page 8, under "Resolution Without Issuance of a Charging Document" there should be an option for a charging document NOT being issued due to insufficient evidence to support the complaint. 4 – I am aware that the proposed complaint process for misconduct applies to all credentialled languages, but I find it highly discriminatory that the skills assessment only applies to Spanish. It should either be eliminated completely, or applied to all. 5 – This entire review system seems to only apply to credentialed interpreters, but there are many non-credentialed interpreters working in Court, and within the private sector, who seem to be immune and protected from complaints for misconduct. They too should have a place for review for alleged misconduct, along with their own form of disciplinary action, such as not being allowed to work in any legal proceeding for a certain amount of time, for example. Otherwise, the current system would be rewarding non-compliance, instead of doing what is intended to do: maintaining professional standards and accountability. It also would extinguish any motivation to obtain and maintain the credential, worsening the current shortage of credentialed interpreters. Nobody would want to be subjected to a flawed disciplinary process that favors certain languages over others, and non-credentialed people over credentialed professionals. I humbly ask that you please consider the points I listed above in this review, and make the necessary adjustments to better serve the people and to maintain fairness for all. Kind Regards.	a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two

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				evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). Credential review and trial court employment discipline serve distinct, though sometimes related, purposes. Trial courts remain responsible for addressing employment matters, including any applicable collective bargaining, representation, grievance, and due process requirements. These actions are focused on an interpreter's employment with the trial court. In contrast, the Judicial Council's credential review process is focused specifically on an interpreter's statewide credential and its responsibility to maintain the integrity of that credential. While the same conduct may give rise to both employment-related and credentialing concerns, each process addresses a different interest and operates within its respective authority. The credential review process is not intended to

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				replace, duplicate, or circumvent applicable employment processes or protections. The Credential Review Procedures apply specifically to California certified and registered court interpreters who hold a Judicial Council-issued credential and are included on the Judicial Council Master List. Accordingly, these procedures are intended to address matters that may affect an interpreter's credential and continued eligibility to maintain that credential. Oversight of non-credentialed or provisionally qualified interpreters falls outside the scope of the Credential Review Procedures and is governed by other applicable trial court policies, Judicial Council program requirements, and related standards or procedures.
4.	Helen Z. Arevalo Certified Court Interpreter; Los Angeles	AM	To the Judicial Council and Court Interpreters Advisory Panel: I am a California court interpreter and respectfully submit the following comments regarding SP26-04, Proposed Revisions to the California Court Interpreter Credential Review Procedures. I support maintaining high professional standards for court interpreters and believe that the public deserves qualified, ethical, and competent language access services. However, I have serious concerns regarding several aspects of the proposed changes. Public Disciplinary Letters Without Formal Due Process. The proposal authorizes the Court Interpreters Program (CIP) to issue disciplinary letters and publicly post the subject and terms of those letters on an interpreter's Master List record. This is concerning because a disciplinary letter could become part of an interpreter's	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having

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			permanent public professional record without a hearing before the Office of Administrative Hearings, without findings by an Administrative Law Judge, and without the procedural protections traditionally associated with formal discipline. A public disciplinary posting can affect an interpreter's professional reputation, future employment opportunities, and standing within the profession. Such consequences should not occur without full due process protections and independent review. Unclear Standards for Skills Assessments The proposal creates a mandatory skills assessment process but does not clearly identify the standards by which interpreters will be evaluated. California's credentialing system already establishes the qualifications necessary to become a certified or registered court interpreter. The proposal appears to create a new layer of evaluation without clearly identifying the performance standard, scoring criteria, appeal rights, evaluator accountability, or protections against subjective judgments. Court interpretation is a highly complex profession performed in real time under constantly changing conditions. Unlike a controlled testing environment, interpreters routinely work through background noise, overlapping speakers, poor acoustics, low volume speakers, rapid speech, trailing words, incomplete sentences, regional accents, emotional testimony, legal terminology, terms of art, and unexpected subject matter. Judges, attorneys, witnesses, and litigants often speak at speeds significantly faster than normal conversational speech. Interpreters frequently raise concerns regarding these communication barriers and environmental impediments, yet those concerns are not always addressed before interpretation continues. Even highly skilled interpreters may occasionally encounter unfamiliar terminology, momentary word-retrieval difficulties, or difficult speech patterns. These realities are inherent in court interpretation and do not necessarily indicate incompetence. The proposal does not adequately explain how evaluators will distinguish between genuine	previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions,

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			deficiencies in an interpreter's knowledge, skills, and abilities and isolated performance issues caused by difficult courtroom conditions. Mandatory Participation and Potential Discipline The proposal states that participation in the skills assessment process is mandatory and that failure to participate may lead to suspension and possible revocation proceedings. I am concerned that an interpreter could face disciplinary consequences based on a dispute regarding participation in the assessment process itself rather than proven misconduct or incompetence. Before such authority is granted, the Judicial Council should establish clear standards, appeal rights, review procedures, and safeguards to ensure fairness and consistency. Broad Expansion of Rule 2.890 Allegations The proposal also expands the potential use of allegations under California Rule of Court 2.890. Rule 2.890 covers broad areas of professional conduct including accuracy, impartiality, confidentiality, conflicts of interest, professional demeanor, and duties to the court. As written, a wide range of alleged conduct could potentially result in disciplinary letters, corrective actions, skills assessments, retesting requirements, and public disclosure before formal adjudication has occurred. Impact on Represented Employee Interpreters Many court interpreters are represented employees working under negotiated Memoranda of Understanding that contain disciplinary procedures, representation rights, grievance procedures, and due process protections. I am concerned that the proposed credential review process could be used to address issues that are already covered by existing disciplinary systems negotiated between courts and employee organizations. Credential review should not become an alternative pathway that bypasses established disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. If implementation of these procedures affects represented employees, the Judicial Council and courts should ensure that applicable	such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine

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			meet-and-confer obligations are satisfied and that negotiated labor protections are respected. Requested Revisions I respectfully request that the Judicial Council: 1. Remove the provision authorizing public posting of disciplinary letters that have not been adjudicated through a formal hearing process. 2. Establish clear, objective, validated, and transparent standards for skills assessments. 3. Provide meaningful appeal rights and independent review of assessment results. 4. Clarify how environmental and courtroom conditions will be considered when evaluating interpreter performance. 5. Ensure that credential review procedures do not circumvent negotiated disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. 6. Preserve full due process protections before disciplinary actions become public. Include Union Representation in the Development and Oversight Process. The Judicial Council should include representatives of the California Federation of Interpreters and other interpreter stakeholders in the development, implementation, and ongoing review of the skills assessment and credential review process. Conclusion Court interpreters play a critical role in protecting access to justice and meaningful participation in judicial proceedings. Any system designed to evaluate interpreter competence or impose discipline should be fair, transparent, objective, and respectful of both professional standards and due process rights. I respectfully urge the Judicial Council to revise SP26-04 before adoption. Thank you for your consideration.	whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). A skills assessment would not be required merely because a complaint is filed. It would be required only when the credential review process determines that an assessment is necessary to evaluate a legitimate concern regarding interpreting skills. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. No skills assessment or disciplinary action would be imposed without supporting evidence. Once an assessment is appropriately required, participation is necessary for the Judicial Council to determine whether further action, remediation, or no action is warranted. The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone

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				does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. Credential review and trial court employment discipline serve distinct, though sometimes related, purposes. Trial courts remain responsible for addressing employment matters, including any applicable collective bargaining, representation, grievance, and due process requirements. These actions are focused on an interpreter's employment with the trial court. In contrast, the Judicial Council's credential review process is focused specifically on an interpreter's statewide credential and its responsibility to maintain the integrity of that credential. While the same conduct may give rise to both employment-related and credentialing concerns, each process addresses a different interest and operates within its respective authority. The credential review process is not intended to replace, duplicate, or circumvent applicable employment processes or protections. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment

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				standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.
5.	Verónica Bañuelos California Certified/Registered Court Interpreter, Spanish; Cypress	AM	To the Judicial Council and Court Interpreters Advisory Panel: I am a California court interpreter and respectfully submit the following comments regarding SP26-04, Proposed Revisions to the California Court Interpreter Credential Review Procedures. I support maintaining high professional standards for court interpreters and believe that the public deserves qualified, ethical, and competent language access services. However, I have serious concerns regarding several aspects of the proposed changes. Public Disciplinary Letters Without Formal Due Process The proposal authorizes the Court Interpreters	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate

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			Program (CIP) to issue disciplinary letters and publicly post the subject and terms of those letters on an interpreter's Master List record. This is concerning because a disciplinary letter could become part of an interpreter's permanent public professional record without a hearing before the Office of Administrative Hearings, without findings by an Administrative Law Judge, and without the procedural protections traditionally associated with formal discipline. A public disciplinary posting can affect an interpreter's professional reputation, future employment opportunities, and standing within the profession. Such consequences should not occur without full due process protections and independent review. Unclear Standards for Skills Assessments The proposal creates a mandatory skills assessment process but does not clearly identify the standards by which interpreters will be evaluated. California's credentialing system already establishes the qualifications necessary to become a certified or registered court interpreter. The proposal appears to create a new layer of evaluation without clearly identifying the performance standard, scoring criteria, appeal rights, evaluator accountability, or protections against subjective judgments. Court interpretation is a highly complex profession performed in real time under constantly changing conditions. Unlike a controlled testing environment, interpreters routinely work through background noise, overlapping speakers, poor acoustics, lowvolume speakers, rapid speech, trailing words, incomplete sentences, regional accents, emotional testimony, legal terminology, terms of art, and unexpected subject matter. Judges, attorneys, witnesses, and litigants often speak at speeds significantly faster than normal conversational speech. Interpreters frequently raise concerns regarding these communication barriers and environmental impediments, yet those concerns are not always addressed before interpretation continues. Even highly skilled interpreters may occasionally encounter unfamiliar terminology, momentary word-retrieval	when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish

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			difficulties, or difficult speech patterns. These realities are inherent in court interpretation and do not necessarily indicate incompetence. The proposal does not adequately explain how evaluators will distinguish between genuine deficiencies in an interpreter's knowledge, skills, and abilities and isolated performance issues caused by difficult courtroom conditions. Mandatory Participation and Potential Discipline The proposal states that participation in the skills assessment process is mandatory and that failure to participate may lead to suspension and possible revocation proceedings. I am concerned that an interpreter could face disciplinary consequences based on a dispute regarding participation in the assessment process itself rather than proven misconduct or incompetence. Before such authority is granted, the Judicial Council should establish clear standards, appeal rights, review procedures, and safeguards to ensure fairness and consistency. Broad Expansion of Rule 2.890 Allegations The proposal also expands the potential use of allegations under California Rule of Court 2.890. Rule 2.890 covers broad areas of professional conduct including accuracy, impartiality, confidentiality, conflicts of interest, professional demeanor, and duties to the court. As written, a wide range of alleged conduct could potentially result in disciplinary letters, corrective actions, skills assessments, retesting requirements, and public disclosure before formal adjudication has occurred. Impact on Represented Employee Interpreters Many court interpreters are represented employees working under negotiated Memoranda of Understanding that contain disciplinary procedures, representation rights, grievance procedures, and due process protections. I am concerned that the proposed credential review process could be used to address issues that are already covered by existing disciplinary systems negotiated between courts and employee organizations. Credential review should not become an alternative pathway that bypasses established disciplinary procedures, union representation rights,	genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and

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			grievance procedures, or other protections contained in collective bargaining agreements. If implementation of these procedures affects represented employees, the Judicial Council and courts should ensure that applicable meet-and-confer obligations are satisfied and that negotiated labor protections are respected. Requested Revisions I respectfully request that the Judicial Council: 1. Remove the provision authorizing public posting of disciplinary letters that have not been adjudicated through a formal hearing process. 2. Establish clear, objective, validated, and transparent standards for skills assessments. 3. Provide meaningful appeal rights and independent review of assessment results. 4. Clarify how environmental and courtroom conditions will be considered when evaluating interpreter performance. 5. Ensure that credential review procedures do not circumvent negotiated disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. 6. Preserve full due process protections before disciplinary actions become public. Include Union Representation in the Development and Oversight Process. The Judicial Council should include representatives of the California Federation of Interpreters and other interpreter stakeholders in the development, implementation, and ongoing review of the skills assessment and credential review process. Conclusion Court interpreters play a critical role in protecting access to justice and meaningful participation in judicial proceedings. Any system designed to evaluate interpreter competence or impose discipline should be fair, transparent, objective, and respectful of both professional standards and due process rights. I respectfully urge the Judicial Council to revise SP26-04 before adoption. Thank you for your consideration. Sincerely,	areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). A skills assessment would not be required merely because a complaint is filed. It would be required only when the credential review process determines that an assessment is necessary to evaluate a legitimate concern regarding interpreting skills. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. No skills assessment or disciplinary action would be imposed without supporting evidence. Once an assessment is appropriately required, participation is necessary for the Judicial Council to determine whether further action, remediation, or no action is warranted. The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of

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				The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.
6.	Fanny Becker Court interpreter, Spanish; Santa Clarita	AM	To the Judicial Council and Court Interpreters Advisory Panel: I am a California court interpreter and respectfully submit the following comments regarding SP26-04, Proposed Revisions to the California Court Interpreter Credential Review Procedures. I support maintaining high professional standards for court interpreters and believe that the public deserves qualified, ethical, and competent language access services. However, I have serious	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do

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				applicable employment processes or protections. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.
7.	Mary Lee Behar NC & CA Court Certified Interpreter	N	To Whom It May Concern: I am very concerned about the recent proposal of the CIAP I do not believe a skills assessment for competence-related complaints is appropriate. Court certified interpreters have proven their skills through passing a rigorous exam and the credential	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an

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			renewal system already provides for those interpreters to do continuing education and a maintain a certain number of assignments in order to keep their skills sharp. Complaints of misconduct are just he-said-she-said without supporting evidence. And jeopardizing someone's career without evidence is unacceptable. The complaints process also does not mention an option for holding interpreters harmless/not issuing a charging document in the event of a false or unfounded allegation. Also how is it possible that uncertified interpreters are still being used in court matters, despite complaints of inadequacies and lack of qualifications and continuing education? And why aren't they being subjected to such measures, when they are undermining the fundamental right that people have to due process. Additionally, it seems unfair to target interpreters of one language, when there are many languages used in the courts. I think that rather than attacking the limited supply of credentialed interpreters in CA, you could focus on increasing their pay, making more shifts/staff positions available where needed and adding more interpreter representation in your discussion panels. Under no circumstances, should uncertified or unregistered interpreters be used in court.	intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The proposal does not expand the substantive professional standards contained in California Rule of Court

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8.	Mariana Bension-Larkin Spanish CA and Federally Certified Court Interpreter	AM	To whom it may concern: I'm including below my comments on the CIAP amendment proposal to the California Court Interpreter Credential Review Procedures. In my opinion, the current proposal raises the following concerns: 1. For complaints related to misconduct (not	The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of

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			skills-based complaints), evidence from the complainant should be a mandatory requirement (in the current proposal it doesn't seem to be) 2. According to the current proposal, if a request for a credential review meets "the jurisdictional requirements," the interpreter would be provided a notice with a summary of the allegation(s), the date the allegation(s) took place, and the case file number of the case interpreted, if available or applicable (page 5). However, the proposal does not mention providing the interpreter with the evidence that supports the complaint against him or her (it should be provided). 3. Under "Resolution Without Issuance of a Charging Document" (page 8), none of the options listed include a charging document not being issued due to evidence being insufficient to support the complaint (this option should be included). 4. Although the proposed complaint process for misconduct would apply to interpreters of all credentialed languages, the skills assessment applies only to Spanish for now. This creates an unacceptable disparity among credentialed interpreters. In my opinion, either all interpreters should be subject to discipline regardless of language, or none should be. The current proposal needs revisions in order to avoid implementation of a process that could end up being flawed and arbitrary. I hope that the CIAP addresses these concerns. Finally, and although I'm well aware that the Judicial Council only has authority over credentialed court interpreters, the fact that no proposal is being considered to address complaints against interpreters who do not hold any credentials is troubling and comes across as biased. These interpreters are not just working in court currently in disregard of California law, but also seem to be exempt from facing any disciplinary consequence stemming from misconduct or incompetence, which puts them in a category that defies all logic and gives them a preposterous advantage over those of us who worked hard to get our credentials and who strive to maintain them by paying annual dues and meeting all the requirements imposed by the Judicial Council.	evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and

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				evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). The committee appreciates the concern regarding equitable application across all credentialed languages. The next draft will clarify that the same substantive threshold and procedural protections apply regardless of language and that the Judicial Council will make every effort to create a skills assessment process in every certified language as some are currently in development.
9.	Juana Esther Blanco Court Interpreter ID 300597	AM	To the Judicial Council and Court Interpreters Advisory Panel: I am a California court interpreter and respectfully submit the following comments regarding SP26-04, Proposed Revisions to the California Court Interpreter Credential Review Procedures. I support maintaining high professional standards for court interpreters and believe that the public deserves qualified, ethical, and competent language access services. However, I have serious concerns regarding several aspects of the proposed changes. Public Disciplinary Letters Without Formal Due	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a

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			Process: The proposal authorizes the Court Interpreters Program (CIP) to issue disciplinary letters and publicly post the subject and terms of those letters on an interpreter's Master List record. This is concerning because a disciplinary letter could become part of an interpreter's permanent public professional record without a hearing before the Office of Administrative Hearings, without findings by an Administrative Law Judge, and without the procedural protections traditionally associated with formal discipline. A public disciplinary posting can affect an interpreter's professional reputation, future employment opportunities, and standing within the profession. Such consequences should not occur without full due process protections and independent review. Unclear Standards for Skills Assessments: The proposal creates a mandatory skills assessment process but does not clearly identify the standards by which interpreters will be evaluated. California's credentialing system already establishes the qualifications necessary to become a certified or registered court interpreter. The proposal appears to create a new layer of evaluation without clearly identifying the performance standard, scoring criteria, appeal rights, evaluator accountability, or protections against subjective judgments. Court interpretation is a highly complex profession performed in real time under constantly changing conditions. Unlike a controlled testing environment, interpreters routinely work through background noise, overlapping speakers, poor acoustics, low-volume speakers, rapid speech, trailing words, incomplete sentences, regional accents, emotional testimony, legal terminology, terms of art, and unexpected subject matter. Judges, attorneys, witnesses, and litigants often speak at speeds significantly faster than normal conversational speech. Interpreters frequently raise concerns regarding these communication barriers and environmental impediments, yet those concerns are not always addressed before interpretation continues. Even highly skilled interpreters may occasionally encounter	disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern.

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			unfamiliar terminology, momentary word-retrieval difficulties, or difficult speech patterns. These realities are inherent in court interpretation and do not necessarily indicate incompetence. The proposal does not adequately explain how evaluators will distinguish between genuine deficiencies in an interpreter's knowledge, skills, and abilities and isolated performance issues caused by difficult courtroom conditions. Mandatory Participation and Potential Discipline: The proposal states that participation in the skills assessment process is mandatory and that failure to participate may lead to suspension and possible revocation proceedings. I am concerned that an interpreter could face disciplinary consequences based on a dispute regarding participation in the assessment process itself rather than proven misconduct or incompetence. Before such authority is granted, the Judicial Council should establish clear standards, appeal rights, review procedures, and safeguards to ensure fairness and consistency. Broad Expansion of Rule 2.890 Allegations: The proposal also expands the potential use of allegations under California Rule of Court 2.890. Rule 2.890 covers broad areas of professional conduct including accuracy, impartiality, confidentiality, conflicts of interest, professional demeanor, and duties to the court. As written, a wide range of alleged conduct could potentially result in disciplinary letters, corrective actions, skills assessments, retesting requirements, and public disclosure before formal adjudication has occurred. Impact on Represented Employee Interpreters: Many court interpreters are represented employees working under negotiated Memoranda of Understanding that contain disciplinary procedures, representation rights, grievance procedures, and due process protections. I am concerned that the proposed credential review process could be used to address issues that are already covered by existing disciplinary systems negotiated between courts and employee organizations. Credential review should not become an alternative pathway that bypasses established	The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to

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			disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. If implementation of these procedures affects represented employees, the Judicial Council and courts should ensure that applicable meet-and-confer obligations are satisfied and that negotiated labor protections are respected. Requested Revisions: I respectfully request that the Judicial Council: 1. Remove the provision authorizing public posting of disciplinary letters that have not been adjudicated through a formal hearing process. 2. Establish clear, objective, validated, and transparent standards for skills assessments. 3. Provide meaningful appeal rights and independent review of assessment results. 4. Clarify how environmental and courtroom conditions will be considered when evaluating interpreter performance. 5. Ensure that credential review procedures do not circumvent negotiated disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. 6. Preserve full due process protections before disciplinary actions become public. 7. Include Union Representation in the Development and Oversight Process. The Judicial Council should include representatives of the California Federation of Interpreters and other interpreter stakeholders in the development, implementation, and ongoing review of the skills assessment and credential review process. Conclusion: Court interpreters play a critical role in protecting access to justice and meaningful participation in judicial proceedings. Any system designed to evaluate interpreter competence or impose discipline should be fair, transparent, objective, and respectful of both professional standards and due process rights. I respectfully urge the Judicial Council to revise SP26-04 before adoption. Thank you for your consideration.	identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). A skills assessment would not be required merely because a complaint is filed. It would be required only when the credential review process determines that an assessment is necessary to evaluate a legitimate concern regarding interpreting skills. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. No skills assessment or disciplinary action would be imposed without supporting evidence. Once an assessment is appropriately required, participation is necessary for the Judicial Council to determine whether further action, remediation, or no action is warranted. The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional

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				procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. Credential review and trial court employment discipline serve distinct, though sometimes related, purposes. Trial courts remain responsible for addressing employment matters, including any applicable collective bargaining, representation, grievance, and due process requirements. These actions are focused on an interpreter's employment with the trial court. In contrast, the Judicial Council's credential review process is focused specifically on an interpreter's statewide credential and its responsibility to maintain the integrity of that credential. While the same conduct may give rise to both employment-related and credentialing concerns, each process addresses a different interest and operates within its respective authority. The credential review process is not intended to replace, duplicate, or circumvent applicable employment processes or protections.

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				The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.
10.	Caterina Cruz Bruzzone	NI	Hello, After reviewing the document I have a few questions, and concerns: 1. Who would be deciding whether a complaint has enough merit to proceed? Based on what guidelines are complaints found to be substantial? Are the reviewers Certified Court interpreters, too? This must be clearer. 2. Is the evidence submitted going to be available to the interpreter in question? This should be	The committee appreciates the concern regarding equitable application across all credentialed languages. The next draft will clarify that the same substantive threshold and procedural protections apply regardless of language and that the

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			required. 3. If there is not enough evidence for the complaint to proceed, why is doing nothing in respect to the interpreter involved not an option? Please see Under "Resolution Without Issuance of a Charging Document" (page 8) for reference. 4. Only Spanish interpreters would fall under this proposed draft? That could be construed as discriminatory, and frankly unfair. All certified interpreters of all languages should be subject to the same standard! 5. The entity that certifies the professional (Judicial Council) is entertaining the concept of not being stringent enough with the certification requirements when anyone can file a complaint regarding what that individual considers incompetence on the part of the interpreter… As a recommendation, the Council should reexamine the standards of the certification process, and/or educate the clients about the interpreting profession. Only complaints that have merit, and infringe upon the Ethics, and Professional Conduct Standards should be even considered. 6. The interpreting profession is already in a precarious situation when it comes to making sure that Certified Court Interpreters are providing interpreting services nowadays. This is only going to make it harder since the standard does not apply to non certified interpreters. Thank you for your attention.	Judicial Council will make every effort to create a skills assessment process in every certified language as some are currently in development.
11.	Delia Calderon-Smith California Certified/Registered Court Interpreter, Spanish; Los Angeles	AM	To the Judicial Council and Court Interpreters Advisory Panel: I am a California court interpreter and respectfully submit the following comments regarding SP26-04, Proposed Revisions to the California Court Interpreter Credential Review Procedures. I support maintaining high professional standards for court interpreters and believe that the public deserves qualified, ethical, and competent language access services. However, I have serious concerns regarding several aspects of the proposed changes. Public Disciplinary Letters Without Formal Due Process: The proposal authorizes the Court Interpreters Program (CIP) to issue disciplinary letters and publicly post the subject and terms of those letters on an interpreter's Master List record. This is concerning because	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having

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			a disciplinary letter could become part of an interpreter's permanent public professional record without a hearing before the Office of Administrative Hearings, without findings by an Administrative Law Judge, and without the procedural protections traditionally associated with formal discipline. A public disciplinary posting can affect an interpreter's professional reputation, future employment opportunities, and standing within the profession. Such consequences should not occur without full due process protections and independent review. Unclear Standards for Skills Assessments: The proposal creates a mandatory skills assessment process but does not clearly identify the standards by which interpreters will be evaluated. California's credentialing system already establishes the qualifications necessary to become a certified or registered court interpreter. The proposal appears to create a new layer of evaluation without clearly identifying the performance standard, scoring criteria, appeal rights, evaluator accountability, or protections against subjective judgments. Court interpretation is a highly complex profession performed in real time under constantly changing conditions. Unlike a controlled testing environment, interpreters routinely work through background noise, overlapping speakers, poor acoustics, low-volume speakers, rapid speech, trailing words, incomplete sentences, regional accents, emotional testimony, legal terminology, terms of art, and unexpected subject matter. Judges, attorneys, witnesses, and litigants often speak at speeds significantly faster than normal conversational speech. Interpreters frequently raise concerns regarding these communication barriers and environmental impediments, yet those concerns are not always addressed before interpretation continues. Even highly skilled interpreters may occasionally encounter unfamiliar terminology, momentary word-retrieval difficulties, or difficult speech patterns. These realities are inherent in court interpretation and do not necessarily indicate incompetence. The proposal does not adequately	previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions,

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			explain how evaluators will distinguish between genuine deficiencies in an interpreter's knowledge, skills, and abilities and isolated performance issues caused by difficult courtroom conditions. Mandatory Participation and Potential Discipline: The proposal states that participation in the skills assessment process is mandatory and that failure to participate may lead to suspension and possible revocation proceedings. I am concerned that an interpreter could face disciplinary consequences based on a dispute regarding participation in the assessment process itself rather than proven misconduct or incompetence. Before such authority is granted, the Judicial Council should establish clear standards, appeal rights, review procedures, and safeguards to ensure fairness and consistency. Broad Expansion of Rule 2.890 Allegations: The proposal also expands the potential use of allegations under California Rule of Court 2.890. Rule 2.890 covers broad areas of professional conduct including accuracy, impartiality, confidentiality, conflicts of interest, professional demeanor, and duties to the court. As written, a wide range of alleged conduct could potentially result in disciplinary letters, corrective actions, skills assessments, retesting requirements, and public disclosure before formal adjudication has occurred. Impact on Represented Employee Interpreters: Many court interpreters are represented employees working under negotiated Memoranda of Understanding that contain disciplinary procedures, representation rights, grievance procedures, and due process protections. I am concerned that the proposed credential review process could be used to address issues that are already covered by existing disciplinary systems negotiated between courts and employee organizations. Credential review should not become an alternative pathway that bypasses established disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. If implementation of these procedures affects represented employees, the	such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine

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			Judicial Council and courts should ensure that applicable meet-and-confer obligations are satisfied and that negotiated labor protections are respected. Requested Revisions: I respectfully request that the Judicial Council: 1. Remove the provision authorizing public posting of disciplinary letters that have not been adjudicated through a formal hearing process. 2. Establish clear, objective, validated, and transparent standards for skills assessments. 3. Provide meaningful appeal rights and independent review of assessment results. 4. Clarify how environmental and courtroom conditions will be considered when evaluating interpreter performance. 5. Ensure that credential review procedures do not circumvent negotiated disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. 6. Preserve full due process protections before disciplinary actions become public. 7. Include Union Representation in the Development and Oversight Process. The Judicial Council should include representatives of the California Federation of Interpreters and other interpreter stakeholders in the development, implementation, and ongoing review of the skills assessment and credential review process. Conclusion: Court interpreters play a critical role in protecting access to justice and meaningful participation in judicial proceedings. Any system designed to evaluate interpreter competence or impose discipline should be fair, transparent, objective, and respectful of both professional standards and due process rights. I respectfully urge the Judicial Council to revise SP26-04 before adoption. Thank you for your consideration.	whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). A skills assessment would not be required merely because a complaint is filed. It would be required only when the credential review process determines that an assessment is necessary to evaluate a legitimate concern regarding interpreting skills. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. No skills assessment or disciplinary action would be imposed without supporting evidence. Once an assessment is appropriately required, participation is necessary for the Judicial Council to determine whether further action, remediation, or no action is warranted. The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone

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				does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. Credential review and trial court employment discipline serve distinct, though sometimes related, purposes. Trial courts remain responsible for addressing employment matters, including any applicable collective bargaining, representation, grievance, and due process requirements. These actions are focused on an interpreter's employment with the trial court. In contrast, the Judicial Council's credential review process is focused specifically on an interpreter's statewide credential and its responsibility to maintain the integrity of that credential. While the same conduct may give rise to both employment-related and credentialing concerns, each process addresses a different interest and operates within its respective authority. The credential review process is not intended to replace, duplicate, or circumvent applicable employment processes or protections. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment

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				standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.
12.	California Alliance of Legal Interpreters (CALI) by Daniel Navarro, Chair	N	To the Court Interpreters Advisory Panel: The California Alliance of Legal Interpreters (CALI) represents court interpreters employed by California's superior courts in Region 2. We write in strong opposition to SP26-04. As currently drafted, the proposal creates serious due process and fairness problems for the interpreters we represent and should not be adopted without substantial revision. Our objections: A complaint is not proof, and this proposal treats it as if it were. Under SP26-04, a complaint from someone who may know nothing about languages or interpreting can set off a skills assessment, a public	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate

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			disciplinary letter, and even forced re-examination. The Judicial Council's own Ethics Guide recognizes that parties may challenge an interpreter's rendition and treats such challenges as a normal part of courtroom events. A challenge is not evidence the interpreter was wrong. Complaints must be properly investigated before any of these consequences move forward. No public discipline without a hearing. Under the current procedures, an interpreter is served a charging document and could contest it at a hearing before an administrative law judge before any sanction became final or public—the only exceptions are resolutions the interpreter consent to. SP26-04 places the new disciplinary letter under "Resolution Without Issuance of a Charging Document," so no charging document is filed, no hearing is triggered, yet the letter is still posted publicly on the interpreter's Master List entry. The proposal even calls it a "sanction," yet it bypasses the hearing every other sanction requires. Any sanction that is publicly posted must first afford the interpreter the same right to a hearing the procedures already guarantee. Public disciplinary letters punish before anything is proven. Posting a disciplinary letter on a public Master List entry—before any hearing and before any allegation is established— inflicts real reputational and financial harm based on unproven claims. This provision should be removed. Impromptu testing is arbitrary and does not measure real ability. Interpreters prepare for months for certification exams that are extremely difficult and that do not always reflect the demands of daily courtroom work. Subjecting an experienced, credentialed interpreter to an unprepared reassessment—or back to those exams—measures how they perform cold, not their actual skill or years of proven experience. Forcing this on the basis of an unproven complaint is unfair. This puts our members' livelihoods at risk and intrudes on the labor process. For the court interpreters we represent, losing a credential does not merely affect reputation—it ends their employment and their income. Our members are covered by collective	when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish

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			bargaining agreements and are entitled to union representation in matters affecting their employment. The proposal acknowledges that court discipline of an employee interpreter "may be considered in the credential review process," which improperly routes workplace matters—matters that belong in the MOU and the labor process—into the credential system, where the protections our members have bargained for do not apply. The proposal punishes new interpreters for systemic assignment failures. Newly certified interpreters need mentoring and a ramp-up period—ideally at least one year— before being assigned to high-stakes proceedings such as trials and difficult testimony. The Judicial Council's own 2025 Interpreter Workforce Study recommends that the Council develop apprenticeship and mentorship programs, and other jurisdictions such as Texas already require supervised mentored practice as part of certification. In practice, however, coordinators and managers routinely assign newly certified interpreters directly to these high-stakes cases with no mentoring or transition period. SP26-04 would then expose that interpreter to complaints, skills assessment, public discipline, and re-examination for struggling in an assignment they should never have been given without support. This punishes the interpreter for what is, in reality, a systemic assignment failure. We call on the panel to remove the public posting of disciplinary letters, to require full investigation before any skills assessment, to decouple non-participation from automatic suspension, to protect the labor rights of employee interpreters, and to abandon the use of arbitrary impromptu examinations triggered by unproven complaints. Absent these changes, CALI opposes adoption of SP26-04.	genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and

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				areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. Credential review and trial court employment discipline serve distinct, though sometimes related, purposes. Trial courts remain responsible for addressing employment matters, including any applicable collective bargaining, representation, grievance, and due process requirements. These

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				actions are focused on an interpreter's employment with the trial court. In contrast, the Judicial Council's credential review process is focused specifically on an interpreter's statewide credential and its responsibility to maintain the integrity of that credential. While the same conduct may give rise to both employment-related and credentialing concerns, each process addresses a different interest and operates within its respective authority. The credential review process is not intended to replace, duplicate, or circumvent applicable employment processes or protections. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to

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				provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.
13.	Cynthia Campos California Certified/Registered Court Interpreter, Spanish; San Bernardino	AM	To the Judicial Council and Court Interpreters Advisory Panel: I am a California court interpreter and respectfully submit the following comments regarding SP26-04, Proposed Revisions to the California Court Interpreter Credential Review Procedures. I support maintaining high professional standards for court interpreters and believe that the public deserves qualified, ethical, and competent language access services. However, I have serious concerns regarding several aspects of the proposed changes. Public Disciplinary Letters Without Formal Due Process The proposal authorizes the Court Interpreters Program (CIP) to issue disciplinary letters and publicly post the subject and terms of those letters on an interpreter's Master List record. This is concerning because a disciplinary letter could become part of an interpreter's permanent public professional record without a hearing before the Office of Administrative Hearings, without findings by an Administrative Law Judge, and without the procedural protections traditionally associated with formal discipline. A public disciplinary posting can affect an interpreter's professional reputation, future employment opportunities, and standing within the profession. Such consequences should not occur without full due process protections and independent review. Unclear Standards for Skills Assessments The proposal creates a mandatory skills assessment process but does not clearly identify the standards by which interpreters will be evaluated. California's credentialing system already establishes the	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to

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			qualifications necessary to become a certified or registered court interpreter. The proposal appears to create a new layer of evaluation without clearly identifying the performance standard, scoring criteria, appeal rights, evaluator accountability, or protections against subjective judgments. Court interpretation is a highly complex profession performed in real time under constantly changing conditions. Unlike a controlled testing environment, interpreters routinely work through background noise, overlapping speakers, poor acoustics, low-volume speakers, rapid speech, trailing words, incomplete sentences, regional accents, emotional testimony, legal terminology, terms of art, and unexpected subject matter. Judges, attorneys, witnesses, and litigants often speak at speeds significantly faster than normal conversational speech. Interpreters frequently raise concerns regarding these communication barriers and environmental impediments, yet those concerns are not always addressed before interpretation continues. Even highly skilled interpreters may occasionally encounter unfamiliar terminology, momentary word retrieval difficulties, or difficult speech patterns. These realities are inherent in court interpretation and do not necessarily indicate incompetence. The proposal does not adequately explain how evaluators will distinguish between genuine deficiencies in an interpreter's knowledge, skills, and abilities and isolated performance issues caused by difficult courtroom conditions. Mandatory Participation and Potential Discipline The proposal states that participation in the skills assessment process is mandatory and that failure to participate may lead to suspension and possible revocation proceedings. I am concerned that an interpreter could face disciplinary consequences based on a dispute regarding participation in the assessment process itself rather than proven misconduct or incompetence. Before such authority is granted, the Judicial Council should establish clear standards, appeal rights, review procedures, and safeguards to ensure fairness and consistency. Broad	provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for

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			Expansion of Rule 2.890 Allegations The proposal also expands the potential use of allegations under California Rule of Court 2.890. Rule 2.890 covers broad areas of professional conduct including accuracy, impartiality, confidentiality, conflicts of interest, professional demeanor, and duties to the court. As written, a wide range of alleged conduct could potentially result in disciplinary letters, corrective actions, skills assessments, retesting requirements, and public disclosure before formal adjudication has occurred. Impact on Represented Employee Interpreters Many court interpreters are represented employees working under negotiated Memoranda of Understanding that contain disciplinary procedures, representation rights, grievance procedures, and due process protections. I am concerned that the proposed credential review process could be used to address issues that are already covered by existing disciplinary systems negotiated between courts and employee organizations. Credential review should not become an alternative pathway that bypasses established disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. If implementation of these procedures affects represented employees, the Judicial Council and courts should ensure that applicable meet-and-confer obligations are satisfied and that negotiated labor protections are respected. Requested Revisions I respectfully request that the Judicial Council: 1. Remove the provision authorizing public posting of disciplinary letters that have not been adjudicated through a formal hearing process. 2. Establish clear, objective, validated, and transparent standards for skills assessments. 3. Provide meaningful appeal rights and independent review of assessment results. 4. Clarify how environmental and courtroom conditions will be considered when evaluating interpreter performance. 5. Ensure that credential review procedures do not circumvent negotiated disciplinary procedures, union representation rights,	court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). A skills assessment would not be required merely because a complaint is filed. It would be required only when the credential review process

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			grievance procedures, or other protections contained in collective bargaining agreements. 6. Preserve full due process protections before disciplinary actions become public. Include Union Representation in the Development and Oversight Process. The Judicial Council should include representatives of the California Federation of Interpreters and other interpreter stakeholders in the development, implementation, and ongoing review of the skills assessment and credential review process. Conclusion Court interpreters play a critical role in protecting access to justice and meaningful participation in judicial proceedings. Any system designed to evaluate interpreter competence or impose discipline should be fair, transparent, objective, and respectful of both professional standards and due process rights. I respectfully urge the Judicial Council to revise SP26-04 before adoption. Thank you for your consideration.	determines that an assessment is necessary to evaluate a legitimate concern regarding interpreting skills. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. No skills assessment or disciplinary action would be imposed without supporting evidence. Once an assessment is appropriately required, participation is necessary for the Judicial Council to determine whether further action, remediation, or no action is warranted. The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. Credential review and trial court employment discipline serve distinct, though sometimes related, purposes. Trial courts remain responsible for addressing employment matters,

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				including any applicable collective bargaining, representation, grievance, and due process requirements. These actions are focused on an interpreter's employment with the trial court. In contrast, the Judicial Council's credential review process is focused specifically on an interpreter's statewide credential and its responsibility to maintain the integrity of that credential. While the same conduct may give rise to both employment-related and credentialing concerns, each process addresses a different interest and operates within its respective authority. The credential review process is not intended to replace, duplicate, or circumvent applicable employment processes or protections. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also

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				maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.
14.	Roxana Cardenas CFI Local 39000 Steward; Spanish-English CA and Federally Certified Court Interpreter	AM	To the Judicial Council and Court Interpreters Advisory Panel: I am a California court interpreter and respectfully submit the following comments regarding SP26-04, Proposed Revisions to the California Court Interpreter Credential Review Procedures. I support maintaining high professional standards for court interpreters and believe that the public deserves qualified, ethical, and competent language access services. However, I have serious concerns regarding several aspects of the proposed changes. Public Disciplinary Letters Without Formal Due Process The proposal authorizes the Court Interpreters Program (CIP) to issue disciplinary letters and publicly post the subject and terms of those letters on an interpreter's Master List record. This is concerning because a disciplinary letter could become part of an interpreter's permanent public professional record without a hearing before the Office of Administrative Hearings, without findings by an Administrative Law Judge, and without the procedural protections traditionally associated with formal discipline. A public disciplinary posting can affect an interpreter's professional reputation, future employment opportunities, and standing within the profession. Such consequences should not occur without full due process protections and independent review. Unclear Standards for Skills Assessments The proposal creates a mandatory skills	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made.

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			assessment process but does not clearly identify the standards by which interpreters will be evaluated. California's credentialing system already establishes the qualifications necessary to become a certified or registered court interpreter. The proposal appears to create a new layer of evaluation without clearly identifying the performance standard, scoring criteria, appeal rights, evaluator accountability, or protections against subjective judgments. Court interpretation is a highly complex profession performed in real time under constantly changing conditions. Unlike a controlled testing environment, interpreters routinely work through background noise, overlapping speakers, poor acoustics, lowvolume speakers, rapid speech, trailing words, incomplete sentences, regional accents, emotional testimony, legal terminology, terms of art, and unexpected subject matter. Judges, attorneys, witnesses, and litigants often speak at speeds significantly faster than normal conversational speech. Interpreters frequently raise concerns regarding these communication barriers and environmental impediments, yet those concerns are not always addressed before interpretation continues. Even highly skilled interpreters may occasionally encounter unfamiliar terminology, momentary word-retrieval difficulties, or difficult speech patterns. These realities are inherent in court interpretation and do not necessarily indicate incompetence. The proposal does not adequately explain how evaluators will distinguish between genuine deficiencies in an interpreter's knowledge, skills, and abilities and isolated performance issues caused by difficult courtroom conditions. Mandatory Participation and Potential Discipline The proposal states that participation in the skills assessment process is mandatory and that failure to participate may lead to suspension and possible revocation proceedings. I am concerned that an interpreter could face disciplinary consequences based on a dispute regarding participation in the assessment process itself rather than proven misconduct or incompetence. Before	However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises

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			such authority is granted, the Judicial Council should establish clear standards, appeal rights, review procedures, and safeguards to ensure fairness and consistency. Broad Expansion of Rule 2.890 Allegations The proposal also expands the potential use of allegations under California Rule of Court 2.890. Rule 2.890 covers broad areas of professional conduct including accuracy, impartiality, confidentiality, conflicts of interest, professional demeanor, and duties to the court. As written, a wide range of alleged conduct could potentially result in disciplinary letters, corrective actions, skills assessments, retesting requirements, and public disclosure before formal adjudication has occurred. Impact on Represented Employee Interpreters Many court interpreters are represented employees working under negotiated Memoranda of Understanding that contain disciplinary procedures, representation rights, grievance procedures, and due process protections. I am concerned that the proposed credential review process could be used to address issues that are already covered by existing disciplinary systems negotiated between courts and employee organizations. Credential review should not become an alternative pathway that bypasses established disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. If implementation of these procedures affects represented employees, the Judicial Council and courts should ensure that applicable meet-and-confer obligations are satisfied and that negotiated labor protections are respected. Requested Revisions I respectfully request that the Judicial Council: Remove the provision authorizing public posting of disciplinary letters that have not been adjudicated through a formal hearing process. Establish clear, objective, validated, and transparent standards for skills assessments. Provide meaningful appeal rights and independent review of assessment results. Clarify how environmental and courtroom conditions will be considered when evaluating	concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH).

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			interpreter performance. Ensure that credential review procedures do not circumvent negotiated disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. Preserve full due process protections before disciplinary actions become public. Include Union Representation in the Development and Oversight Process. The Judicial Council should include representatives of the California Federation of Interpreters and other interpreter stakeholders in the development, implementation, and ongoing review of the skills assessment and credential review process. Conclusion Court interpreters play a critical role in protecting access to justice and meaningful participation in judicial proceedings. Any system designed to evaluate interpreter competence or impose discipline should be fair, transparent, objective, and respectful of both professional standards and due process rights. I respectfully urge the Judicial Council to revise SP26-04 before adoption. Thank you for your consideration.	A skills assessment would not be required merely because a complaint is filed. It would be required only when the credential review process determines that an assessment is necessary to evaluate a legitimate concern regarding interpreting skills. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. No skills assessment or disciplinary action would be imposed without supporting evidence. Once an assessment is appropriately required, participation is necessary for the Judicial Council to determine whether further action, remediation, or no action is warranted. The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made.

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				Credential review and trial court employment discipline serve distinct, though sometimes related, purposes. Trial courts remain responsible for addressing employment matters, including any applicable collective bargaining, representation, grievance, and due process requirements. These actions are focused on an interpreter's employment with the trial court. In contrast, the Judicial Council's credential review process is focused specifically on an interpreter's statewide credential and its responsibility to maintain the integrity of that credential. While the same conduct may give rise to both employment-related and credentialing concerns, each process addresses a different interest and operates within its respective authority. The credential review process is not intended to replace, duplicate, or circumvent applicable employment processes or protections. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately

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				without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.
15.	Maritza Resendiz Castillo California Certified Spanish Interpreter	AM	To the Judicial Council and Court Interpreters Advisory Panel: I am a California court interpreter and respectfully submit the following comments regarding SP26-04, Proposed Revisions to the California Court Interpreter Credential Review Procedures. I support maintaining high professional standards for court interpreters and believe that the public deserves qualified, ethical, and competent language access services. However, I have serious concerns regarding several aspects of the proposed changes. Public Disciplinary Letters Without Formal Due Process The proposal authorizes the Court Interpreters Program (CIP) to issue disciplinary letters and publicly post the subject and terms of those letters on an interpreter's Master List record. This is concerning because a disciplinary letter could become part of an interpreter's permanent public professional record without a hearing before the Office of Administrative Hearings, without findings by an Administrative Law Judge, and without the procedural protections traditionally associated with formal	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not

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			discipline. A public disciplinary posting can affect an interpreter's professional reputation, future employment opportunities, and standing within the profession. Such consequences should not occur without full due process protections and independent review. Unclear Standards for Skills Assessments The proposal creates a mandatory skills assessment process but does not clearly identify the standards by which interpreters will be evaluated. California's credentialing system already establishes the qualifications necessary to become a certified or registered court interpreter. The proposal appears to create a new layer of evaluation without clearly identifying the performance standard, scoring criteria, appeal rights, evaluator accountability, or protections against subjective judgments. Court interpretation is a highly complex profession performed in real time under constantly changing conditions. Unlike a controlled testing environment, interpreters routinely work through background noise, overlapping speakers, poor acoustics, low-volume speakers, rapid speech, trailing words, incomplete sentences, regional accents, emotional testimony, legal terminology, terms of art, and unexpected subject matter. Judges, attorneys, witnesses, and litigants often speak at speeds significantly faster than normal conversational speech. Interpreters frequently raise concerns regarding these communication barriers and environmental impediments, yet those concerns are not always addressed before interpretation continues. Even highly skilled interpreters may occasionally encounter unfamiliar terminology, momentary wordretrieval difficulties, or difficult speech patterns. These realities are inherent in court interpretation and do not necessarily indicate incompetence. The proposal does not adequately explain how evaluators will distinguish between genuine deficiencies in an interpreter's knowledge, skills, and abilities and isolated performance issues caused by difficult courtroom conditions. Mandatory Participation and Potential Discipline The proposal states that participation	result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center

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			in the skills assessment process is mandatory and that failure to participate may lead to suspension and possible revocation proceedings. I am concerned that an interpreter could face disciplinary consequences based on a dispute regarding participation in the assessment process itself rather than proven misconduct or incompetence. Before such authority is granted, the Judicial Council should establish clear standards, appeal rights, review procedures, and safeguards to ensure fairness and consistency. Broad Expansion of Rule 2.890 Allegations The proposal also expands the potential use of allegations under California Rule of Court 2.890. Rule 2.890 covers broad areas of professional conduct including accuracy, impartiality, confidentiality, conflicts of interest, professional demeanor, and duties to the court. As written, a wide range of alleged conduct could potentially result in disciplinary letters, corrective actions, skills assessments, retesting requirements, and public disclosure before formal adjudication has occurred. Impact on Represented Employee Interpreters Many court interpreters are represented employees working under negotiated Memoranda of Understanding that contain disciplinary procedures, representation rights, grievance procedures, and due process protections. I am concerned that the proposed credential review process could be used to address issues that are already covered by existing disciplinary systems negotiated between courts and employee organizations. Credential review should not become an alternative pathway that bypasses established disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. If implementation of these procedures affects represented employees, the Judicial Council and courts should ensure that applicable meet-and-confer obligations are satisfied and that negotiated labor protections are respected. Requested Revisions I respectfully request that the Judicial Council: 1. Remove the provision authorizing public posting of	for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are

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			disciplinary letters that have not been adjudicated through a formal hearing process. 2. Establish clear, objective, validated, and transparent standards for skills assessments. 3. Provide meaningful appeal rights and independent review of assessment results. 4. Clarify how environmental and courtroom conditions will be considered when evaluating interpreter performance. 5. Ensure that credential review procedures do not circumvent negotiated disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. 6. Preserve full due process protections before disciplinary actions become public. Include Union Representation in the Development and Oversight Process. The Judicial Council should include representatives of the California Federation of Interpreters and other interpreter stakeholders in the development, implementation, and ongoing review of the skills assessment and credential review process. Conclusion Court interpreters play a critical role in protecting access to justice and meaningful participation in judicial proceedings. Any system designed to evaluate interpreter competence or impose discipline should be fair, transparent, objective, and respectful of both professional standards and due process rights. I respectfully urge the Judicial Council to revise SP26-04 before adoption. Thank you for your consideration.	appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). A skills assessment would not be required merely because a complaint is filed. It would be required only when the credential review process determines that an assessment is necessary to evaluate a legitimate concern regarding interpreting skills. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. No skills assessment or disciplinary action would be imposed without supporting evidence. Once an assessment is appropriately required, participation is necessary for the Judicial Council to determine whether further action, remediation, or no action is warranted. The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with

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				notice of the concerns and an opportunity to respond before a determination is made. Credential review and trial court employment discipline serve distinct, though sometimes related, purposes. Trial courts remain responsible for addressing employment matters, including any applicable collective bargaining, representation, grievance, and due process requirements. These actions are focused on an interpreter's employment with the trial court. In contrast, the Judicial Council's credential review process is focused specifically on an interpreter's statewide credential and its responsibility to maintain the integrity of that credential. While the same conduct may give rise to both employment-related and credentialing concerns, each process addresses a different interest and operates within its respective authority. The credential review process is not intended to replace, duplicate, or circumvent applicable employment processes or protections. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important

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				intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.
16.	Lluvia Camacho Cervantes California Certified/Registered Court Interpreter, Spanish; San Diego	AM	To the Judicial Council and Court Interpreters Advisory Panel: I am a California court interpreter and respectfully submit the following comments regarding SP26-04, Proposed Revisions to the California Court Interpreter Credential Review Procedures. I support maintaining high professional standards for court interpreters and believe that the public deserves qualified, ethical, and competent language access services. However, I have serious concerns regarding several aspects of the proposed changes. Public Disciplinary Letters Without Formal Due Process: The proposal authorizes the Court Interpreters Program (CIP) to issue disciplinary letters and publicly post the subject and terms of those letters on an interpreter's Master List record. This is concerning because a disciplinary letter could become part of an interpreter's permanent public professional record without a hearing	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct.

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			before the Office of Administrative Hearings, without findings by an Administrative Law Judge, and without the procedural protections traditionally associated with formal discipline. A public disciplinary posting can affect an interpreter's professional reputation, future employment opportunities, and standing within the profession. Such consequences should not occur without full due process protections and independent review. Unclear Standards for Skills Assessments: The proposal creates a mandatory skills assessment process but does not clearly identify the standards by which interpreters will be evaluated. California's credentialing system already establishes the qualifications necessary to become a certified or registered court interpreter. The proposal appears to create a new layer of evaluation without clearly identifying the performance standard, scoring criteria, appeal rights, evaluator accountability, or protections against subjective judgments. Court interpretation is a highly complex profession performed in real time under constantly changing conditions. Unlike a controlled testing environment, interpreters routinely work through background noise, overlapping speakers, poor acoustics, low-volume speakers, rapid speech, trailing words, incomplete sentences, regional accents, emotional testimony, legal terminology, terms of art, and unexpected subject matter. Judges, attorneys, witnesses, and litigants often speak at speeds significantly faster than normal conversational speech. Interpreters frequently raise concerns regarding these communication barriers and environmental impediments, yet those concerns are not always addressed before interpretation continues. Even highly skilled interpreters may occasionally encounter unfamiliar terminology, momentary word-retrieval difficulties, or difficult speech patterns. These realities are inherent in court interpretation and do not necessarily indicate incompetence. The proposal does not adequately explain how evaluators will distinguish between genuine deficiencies in an interpreter's knowledge, skills, and	A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech,

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			abilities and isolated performance issues caused by difficult courtroom conditions. Mandatory Participation and Potential Discipline: The proposal states that participation in the skills assessment process is mandatory and that failure to participate may lead to suspension and possible revocation proceedings. I am concerned that an interpreter could face disciplinary consequences based on a dispute regarding participation in the assessment process itself rather than proven misconduct or incompetence. Before such authority is granted, the Judicial Council should establish clear standards, appeal rights, review procedures, and safeguards to ensure fairness and consistency. Broad Expansion of Rule 2.890 Allegations: The proposal also expands the potential use of allegations under California Rule of Court 2.890. Rule 2.890 covers broad areas of professional conduct including accuracy, impartiality, confidentiality, conflicts of interest, professional demeanor, and duties to the court. As written, a wide range of alleged conduct could potentially result in disciplinary letters, corrective actions, skills assessments, retesting requirements, and public disclosure before formal adjudication has occurred. Impact on Represented Employee Interpreters: Many court interpreters are represented employees working under negotiated Memoranda of Understanding that contain disciplinary procedures, representation rights, grievance procedures, and due process protections. I am concerned that the proposed credential review process could be used to address issues that are already covered by existing disciplinary systems negotiated between courts and employee organizations. Credential review should not become an alternative pathway that bypasses established disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. If implementation of these procedures affects represented employees, the Judicial Council and courts should ensure that applicable meet-and-confer obligations are satisfied and that	poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine

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			negotiated labor protections are respected. Requested Revisions: I respectfully request that the Judicial Council: 1. Remove the provision authorizing public posting of disciplinary letters that have not been adjudicated through a formal hearing process. 2. Establish clear, objective, validated, and transparent standards for skills assessments. 3. Provide meaningful appeal rights and independent review of assessment results. 4. Clarify how environmental and courtroom conditions will be considered when evaluating interpreter performance. 5. Ensure that credential review procedures do not circumvent negotiated disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. 6. Preserve full due process protections before disciplinary actions become public. 7. Include Union Representation in the Development and Oversight Process. The Judicial Council should include representatives of the California Federation of Interpreters and other interpreter stakeholders in the development, implementation, and ongoing review of the skills assessment and credential review process. Conclusion: Court interpreters play a critical role in protecting access to justice and meaningful participation in judicial proceedings. Any system designed to evaluate interpreter competence or impose discipline should be fair, transparent, objective, and respectful of both professional standards and due process rights. I respectfully urge the Judicial Council to revise SP26-04 before adoption. Thank you for your consideration.	whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). A skills assessment would not be required merely because a complaint is filed. It would be required only when the credential review process determines that an assessment is necessary to evaluate a legitimate concern regarding interpreting skills. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. No skills assessment or disciplinary action would be imposed without supporting evidence. Once an assessment is appropriately required, participation is necessary for the Judicial Council to determine whether further action, remediation, or no action is warranted. The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone

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				does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. Credential review and trial court employment discipline serve distinct, though sometimes related, purposes. Trial courts remain responsible for addressing employment matters, including any applicable collective bargaining, representation, grievance, and due process requirements. These actions are focused on an interpreter's employment with the trial court. In contrast, the Judicial Council's credential review process is focused specifically on an interpreter's statewide credential and its responsibility to maintain the integrity of that credential. While the same conduct may give rise to both employment-related and credentialing concerns, each process addresses a different interest and operates within its respective authority. The credential review process is not intended to replace, duplicate, or circumvent applicable employment processes or protections. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment

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				standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.
17.	Lor Xiong Chang California Registered Court Interpreter, Hmong; Sacramento	AM	To the Judicial Council and Court Interpreters Advisory Panel: My name is Lor Xiong Chang; I am a California court interpreter and respectfully submit the following comments regarding SP26-04, Proposed Revisions to the California Court Interpreter Credential Review Procedures. I support maintaining high professional standards for court interpreters and believe that the public deserves qualified, ethical, and competent language access services. However, I have serious concerns regarding several aspects of the proposed changes. Public Disciplinary Letters Without Formal Due Process The proposal authorizes the Court	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate

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			Interpreters Program (CIP) to issue disciplinary letters and publicly post the subject and terms of those letters on an interpreter's Master List record. This is concerning because a disciplinary letter could become part of an interpreter's permanent public professional record without a hearing before the Office of Administrative Hearings, without findings by an Administrative Law Judge, and without the procedural protections traditionally associated with formal discipline. A public disciplinary posting can affect an interpreter's professional reputation, future employment opportunities, and standing within the profession. Such consequences should not occur without full due process protections and independent review. Unclear Standards for Skills Assessments The proposal creates a mandatory skills assessment process but does not clearly identify the standards by which interpreters will be evaluated. California's credentialing system already establishes the qualifications necessary to become a certified or registered court interpreter. The proposal appears to create a new layer of evaluation without clearly identifying the performance standard, scoring criteria, appeal rights, evaluator accountability, or protections against subjective judgments. Court interpretation is a highly complex profession performed in real time under constantly changing conditions. Unlike a controlled testing environment, interpreters routinely work through background noise, overlapping speakers, poor acoustics, low-volume speakers, rapid speech, trailing words, incomplete sentences, regional accents, emotional testimony, legal terminology, terms of art, and unexpected subject matter. Judges, attorneys, witnesses, and litigants often speak at speeds significantly faster than normal conversational speech. Interpreters frequently raise concerns regarding these communication barriers and environmental impediments, yet those concerns are not always addressed before interpretation continues. Even highly skilled interpreters may occasionally encounter unfamiliar terminology, momentary word-retrieval	when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish

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			difficulties, or difficult speech patterns. These realities are inherent in court interpretation and do not necessarily indicate incompetence. The proposal does not adequately explain how evaluators will distinguish between genuine deficiencies in an interpreter's knowledge, skills, and abilities and isolated performance issues caused by difficult courtroom conditions. Mandatory Participation and Potential Discipline The proposal states that participation in the skills assessment process is mandatory and that failure to participate may lead to suspension and possible revocation proceedings. I am concerned that an interpreter could face disciplinary consequences based on a dispute regarding participation in the assessment process itself rather than proven misconduct or incompetence. Before such authority is granted, the Judicial Council should establish clear standards, appeal rights, review procedures, and safeguards to ensure fairness and consistency. Broad Expansion of Rule 2.890 Allegations The proposal also expands the potential use of allegations under California Rule of Court 2.890. Rule 2.890 covers broad areas of professional conduct including accuracy, impartiality, confidentiality, conflicts of interest, professional demeanor, and duties to the court. As written, a wide range of alleged conduct could potentially result in disciplinary letters, corrective actions, skills assessments, retesting requirements, and public disclosure before formal adjudication has occurred. Impact on Represented Employee Interpreters Many court interpreters are represented employees working under negotiated Memoranda of Understanding that contain disciplinary procedures, representation rights, grievance procedures, and due process protections. I am concerned that the proposed credential review process could be used to address issues that are already covered by existing disciplinary systems negotiated between courts and employee organizations. Credential review should not become an alternative pathway that bypasses established disciplinary procedures, union representation rights,	genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and

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			grievance procedures, or other protections contained in collective bargaining agreements. If implementation of these procedures affects represented employees, the Judicial Council and courts should ensure that applicable meet-and-confer obligations are satisfied and that negotiated labor protections are respected. Requested Revisions I respectfully request that the Judicial Council: 1. Remove the provision authorizing public posting of disciplinary letters that have not been adjudicated through a formal hearing process. 2. Establish clear, objective, validated, and transparent standards for skills assessments. 3. Provide meaningful appeal rights and independent review of assessment results. 4. Clarify how environmental and courtroom conditions will be considered when evaluating interpreter performance. 5. Ensure that credential review procedures do not circumvent negotiated disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. 6. Preserve full due process protections before disciplinary actions become public. Include Union Representation in the Development and Oversight Process. The Judicial Council should include representatives of the California Federation of Interpreters and other interpreter stakeholders in the development, implementation, and ongoing review of the skills assessment and credential review process. In Conclusion Court interpreters play a critical role in protecting access to justice and meaningful participation in judicial proceedings. Any system designed to evaluate interpreter competence or impose discipline should be fair, transparent, objective, and respectful of both professional standards and due process rights. I respectfully urge the Judicial Council to revise SP26-04 before adoption. Thank you for your consideration.	areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). A skills assessment would not be required merely because a complaint is filed. It would be required only when the credential review process determines that an assessment is necessary to evaluate a legitimate concern regarding interpreting skills. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. No skills assessment or disciplinary action would be imposed without supporting evidence. Once an assessment is appropriately required, participation is necessary for the Judicial Council to determine whether further action, remediation, or no action is warranted. The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of

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				proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. Credential review and trial court employment discipline serve distinct, though sometimes related, purposes. Trial courts remain responsible for addressing employment matters, including any applicable collective bargaining, representation, grievance, and due process requirements. These actions are focused on an interpreter's employment with the trial court. In contrast, the Judicial Council's credential review process is focused specifically on an interpreter's statewide credential and its responsibility to maintain the integrity of that credential. While the same conduct may give rise to both employment-related and credentialing concerns, each process addresses a different interest and operates within its respective authority. The credential review process is not intended to replace, duplicate, or circumvent applicable employment processes or protections.

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				The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.
18.	Benjamin Covarrubias California Certified Court Interpreter, Spanish; San Luis Obispo	AM	To the Judicial Council and Court Interpreters Advisory Panel: I am a California court interpreter and respectfully submit the following comments regarding SP26-04, Proposed Revisions to the California Court Interpreter Credential Review Procedures. I support maintaining high professional standards for court interpreters and believe that the public deserves qualified, ethical, and competent language access services. However, I have serious	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do

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			concerns regarding several aspects of the proposed changes. Public Disciplinary Letters Without Formal Due Process The proposal authorizes the Court Interpreters Program (CIP) to issue disciplinary letters and publicly post the subject and terms of those letters on an interpreter's Master List record. This is concerning because a disciplinary letter could become part of an interpreter's permanent public professional record without a hearing before the Office of Administrative Hearings, without findings by an Administrative Law Judge, and without the procedural protections traditionally associated with formal discipline. A public disciplinary posting can affect an interpreter's professional reputation, future employment opportunities, and standing within the profession. Such consequences should not occur without full due process protections and independent review. Unclear Standards for Skills Assessments The proposal creates a mandatory skills assessment process but does not clearly identify the standards by which interpreters will be evaluated. California's credentialing system already establishes the qualifications necessary to become a certified or registered court interpreter. The proposal appears to create a new layer of evaluation without clearly identifying the performance standard, scoring criteria, appeal rights, evaluator accountability, or protections against subjective judgments. Court interpretation is a highly complex profession performed in real time under constantly changing conditions. Unlike a controlled testing environment, interpreters routinely work through background noise, overlapping speakers, poor acoustics, low-volume speakers, rapid speech, trailing words, incomplete sentences, regional accents, emotional testimony, legal terminology, terms of art, and unexpected subject matter. Judges, attorneys, witnesses, and litigants often speak at speeds significantly faster than normal conversational speech. Interpreters frequently raise concerns regarding these communication barriers and environmental impediments, yet those concerns are not	not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when

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			always addressed before interpretation continues. Even highly skilled interpreters may occasionally encounter unfamiliar terminology, momentary word-retrieval difficulties, or difficult speech patterns. These realities are inherent in court interpretation and do not necessarily indicate incompetence. The proposal does not adequately explain how evaluators will distinguish between genuine deficiencies in an interpreter's knowledge, skills, and abilities and isolated performance issues caused by difficult courtroom conditions. Mandatory Participation and Potential Discipline The proposal states that participation in the skills assessment process is mandatory and that failure to participate may lead to suspension and possible revocation proceedings. I am concerned that an interpreter could face disciplinary consequences based on a dispute regarding participation in the assessment process itself rather than proven misconduct or incompetence. Before such authority is granted, the Judicial Council should establish clear standards, appeal rights, review procedures, and safeguards to ensure fairness and consistency. Broad Expansion of Rule 2.890 Allegations The proposal also expands the potential use of allegations under California Rule of Court 2.890. Rule 2.890 covers broad areas of professional conduct including accuracy, impartiality, confidentiality, conflicts of interest, professional demeanor, and duties to the court. As written, a wide range of alleged conduct could potentially result in disciplinary letters, corrective actions, skills assessments, retesting requirements, and public disclosure before formal adjudication has occurred. Impact on Represented Employee Interpreters Many court interpreters are represented employees working under negotiated Memoranda of Understanding that contain disciplinary procedures, representation rights, grievance procedures, and due process protections. I am concerned that the proposed credential review process could be used to address issues that are already covered by existing disciplinary systems negotiated between courts and	a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two

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			employee organizations. Credential review should not become an alternative pathway that bypasses established disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. If implementation of these procedures affects represented employees, the Judicial Council and courts should ensure that applicable meet-and-confer obligations are satisfied and that negotiated labor protections are respected. Requested Revisions I respectfully request that the Judicial Council: 1.Remove the provision authorizing public posting of disciplinary letters that have not been adjudicated through a formal hearing process. 2.Establish clear, objective, validated, and transparent standards for skills assessments. 3.Provide meaningful appeal rights and independent review of assessment results. 4.Clarify how environmental and courtroom conditions will be considered when evaluating interpreter performance. 5.Ensure that credential review procedures do not circumvent negotiated disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. 6.Preserve full due process protections before disciplinary actions become public. Include Union Representation in the Development and Oversight Process. The Judicial Council should include representatives of the California Federation of Interpreters and other interpreter stakeholders in the development, implementation, and ongoing review of the skills assessment and credential review process. Conclusion Court interpreters play a critical role in protecting access to justice and meaningful participation in judicial proceedings. Any system designed to evaluate interpreter competence or impose discipline should be fair, transparent, objective, and respectful of both professional standards and due process rights. I respectfully urge the Judicial Council to revise SP26-04 before adoption. Thank you for your consideration.	evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). A skills assessment would not be required merely because a complaint is filed. It would be required only when the credential review process determines that an assessment is necessary to evaluate a legitimate concern regarding interpreting skills. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. No skills assessment or disciplinary action would be imposed without supporting evidence. Once an assessment is appropriately required, participation is necessary for the Judicial Council to determine whether further action, remediation, or no action is warranted. The proposal does not expand the substantive professional standards

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				contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. Credential review and trial court employment discipline serve distinct, though sometimes related, purposes. Trial courts remain responsible for addressing employment matters, including any applicable collective bargaining, representation, grievance, and due process requirements. These actions are focused on an interpreter's employment with the trial court. In contrast, the Judicial Council's credential review process is focused specifically on an interpreter's statewide credential and its responsibility to maintain the integrity of that credential. While the same conduct may give rise to both employment-related and credentialing concerns, each process addresses a different interest and operates within its respective authority. The credential review process is not intended to replace, duplicate, or circumvent

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				applicable employment processes or protections. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.
19.	Oscar de la Llera California Certified Interpreter, Spanish; Alhambra	AM	To the Judicial Council and Court Interpreters Advisory Panel: I am a California court interpreter and respectfully submit the following comments regarding SP26-04, Proposed Revisions to the California Court Interpreter Credential Review Procedures. I support maintaining high	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an

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			professional standards for court interpreters and believe that the public deserves qualified, ethical, and competent language access services. However, I have serious concerns regarding several aspects of the proposed changes. Public Disciplinary Letters Without Formal Due Process: The proposal authorizes the Court Interpreters Program (CIP) to issue disciplinary letters and publicly post the subject and terms of those letters on an interpreter's Master List record. This is concerning because a disciplinary letter could become part of an interpreter's permanent public professional record without a hearing before the Office of Administrative Hearings, without findings by an Administrative Law Judge, and without the procedural protections traditionally associated with formal discipline. A public disciplinary posting can affect an interpreter's professional reputation, future employment opportunities, and standing within the profession. Such consequences should not occur without full due process protections and independent review. Unclear Standards for Skills Assessments: The proposal creates a mandatory skills assessment process but does not clearly identify the standards by which interpreters will be evaluated. California's credentialing system already establishes the qualifications necessary to become a certified or registered court interpreter. The proposal appears to create a new layer of evaluation without clearly identifying the performance standard, scoring criteria, appeal rights, evaluator accountability, or protections against subjective judgments. Court interpretation is a highly complex profession performed in real time under constantly changing conditions. Unlike a controlled testing environment, interpreters routinely work through background noise, overlapping speakers, poor acoustics, low-volume speakers, rapid speech, trailing words, incomplete sentences, regional accents, emotional testimony, legal terminology, terms of art, and unexpected subject matter. Judges, attorneys, witnesses, and litigants often speak at speeds significantly faster than normal	intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification

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			conversational speech. Interpreters frequently raise concerns regarding these communication barriers and environmental impediments, yet those concerns are not always addressed before interpretation continues. Even highly skilled interpreters may occasionally encounter unfamiliar terminology, momentary word-retrieval difficulties, or difficult speech patterns. These realities are inherent in court interpretation and do not necessarily indicate incompetence. The proposal does not adequately explain how evaluators will distinguish between genuine deficiencies in an interpreter's knowledge, skills, and abilities and isolated performance issues caused by difficult courtroom conditions. Mandatory Participation and Potential Discipline: The proposal states that participation in the skills assessment process is mandatory and that failure to participate may lead to suspension and possible revocation proceedings. I am concerned that an interpreter could face disciplinary consequences based on a dispute regarding participation in the assessment process itself rather than proven misconduct or incompetence. Before such authority is granted, the Judicial Council should establish clear standards, appeal rights, review procedures, and safeguards to ensure fairness and consistency. Broad Expansion of Rule 2.890 Allegations: The proposal also expands the potential use of allegations under California Rule of Court 2.890. Rule 2.890 covers broad areas of professional conduct including accuracy, impartiality, confidentiality, conflicts of interest, professional demeanor, and duties to the court. As written, a wide range of alleged conduct could potentially result in disciplinary letters, corrective actions, skills assessments, retesting requirements, and public disclosure before formal adjudication has occurred. Impact on Represented Employee Interpreters: Many court interpreters are represented employees working under negotiated Memoranda of Understanding that contain disciplinary procedures, representation rights, grievance procedures, and due process protections. I am concerned that the	examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to

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			proposed credential review process could be used to address issues that are already covered by existing disciplinary systems negotiated between courts and employee organizations. Credential review should not become an alternative pathway that bypasses established disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. If implementation of these procedures affects represented employees, the Judicial Council and courts should ensure that applicable meet-and-confer obligations are satisfied and that negotiated labor protections are respected. Requested Revisions: I respectfully request that the Judicial Council: 1. Remove the provision authorizing public posting of disciplinary letters that have not been adjudicated through a formal hearing process. 2. Establish clear, objective, validated, and transparent standards for skills assessments. 3. Provide meaningful appeal rights and independent review of assessment results. 4. Clarify how environmental and courtroom conditions will be considered when evaluating interpreter performance. 5. Ensure that credential review procedures do not circumvent negotiated disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. 6. Preserve full due process protections before disciplinary actions become public. 7. Include Union Representation in the Development and Oversight Process. The Judicial Council should include representatives of the California Federation of Interpreters and other interpreter stakeholders in the development, implementation, and ongoing review of the skills assessment and credential review process. Conclusion: Court interpreters play a critical role in protecting access to justice and meaningful participation in judicial proceedings. Any system designed to evaluate interpreter competence or impose discipline should be fair, transparent, objective, and respectful of both professional standards and due process rights. I respectfully urge the	reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). A skills assessment would not be required merely because a complaint is filed. It would be required only when the credential review process determines that an assessment is necessary to evaluate a legitimate concern regarding interpreting skills. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. No skills assessment or disciplinary action would be imposed without supporting evidence. Once an assessment is appropriately required, participation is necessary for the Judicial Council to determine whether further action, remediation, or no action is warranted.

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			Judicial Council to revise SP26-04 before adoption. Thank you for your consideration.	The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. Credential review and trial court employment discipline serve distinct, though sometimes related, purposes. Trial courts remain responsible for addressing employment matters, including any applicable collective bargaining, representation, grievance, and due process requirements. These actions are focused on an interpreter's employment with the trial court. In contrast, the Judicial Council's credential review process is focused specifically on an interpreter's statewide credential and its responsibility to maintain the integrity of that credential. While the same conduct may give rise to both employment-related and credentialing concerns, each process addresses a different interest and operates within

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				its respective authority. The credential review process is not intended to replace, duplicate, or circumvent applicable employment processes or protections. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.

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20.	Elizabeth de la Rosa California court interpreter, Spanish	AM	To the Judicial Council and Court Interpreters Advisory Panel: I am a California court interpreter and respectfully submit the following comments regarding SP26-04, Proposed Revisions to the California Court Interpreter Credential Review Procedures. I support maintaining high professional standards for court interpreters and believe that the public deserves qualified, ethical, and competent language access services. However, I have serious concerns regarding several aspects of the proposed changes. Public Disciplinary Letters Without Formal Due Process The proposal authorizes the Court Interpreters Program (CIP) to issue disciplinary letters and publicly post the subject and terms of those letters on an interpreter's Master List record. This is concerning because a disciplinary letter could become part of an interpreter's permanent public professional record without a hearing before the Office of Administrative Hearings, without findings by an Administrative Law Judge, and without the procedural protections traditionally associated with formal discipline. A public disciplinary posting can affect an interpreter's professional reputation, future employment opportunities, and standing within the profession. Such consequences should not occur without full due process protections and independent review. Unclear Standards for Skills Assessments The proposal creates a mandatory skills assessment process but does not clearly identify the standards by which interpreters will be evaluated. California's credentialing system already establishes the qualifications necessary to become a certified or registered court interpreter. The proposal appears to create a new layer of evaluation without clearly identifying the performance standard, scoring criteria, appeal rights, evaluator accountability, or protections against subjective judgments. Court interpretation is a highly complex profession performed in real time under constantly changing conditions. Unlike a controlled testing environment, interpreters routinely work through background noise, overlapping speakers, poor acoustics,	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the

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			low-volume speakers, rapid speech, trailing words, incomplete sentences, regional accents, emotional testimony, legal terminology, terms of art, and unexpected subject matter. Judges, attorneys, witnesses, and litigants often speak at speeds significantly faster than normal conversational speech. Interpreters frequently raise concerns regarding these communication barriers and environmental impediments, yet those concerns are not always addressed before interpretation continues. Even highly skilled interpreters may occasionally encounter unfamiliar terminology, momentary wordretrieval difficulties, or difficult speech patterns. These realities are inherent in court interpretation and do not necessarily indicate incompetence. The proposal does not adequately explain how evaluators will distinguish between genuine deficiencies in an interpreter's knowledge, skills, and abilities and isolated performance issues caused by difficult courtroom conditions. Mandatory Participation and Potential Discipline The proposal states that participation in the skills assessment process is mandatory and that failure to participate may lead to suspension and possible revocation proceedings. I am concerned that an interpreter could face disciplinary consequences based on a dispute regarding participation in the assessment process itself rather than proven misconduct or incompetence. Before such authority is granted, the Judicial Council should establish clear standards, appeal rights, review procedures, and safeguards to ensure fairness and consistency. Broad Expansion of Rule 2.890 Allegations The proposal also expands the potential use of allegations under California Rule of Court 2.890. Rule 2.890 covers broad areas of professional conduct including accuracy, impartiality, confidentiality, conflicts of interest, professional demeanor, and duties to the court. As written, a wide range of alleged conduct could potentially result in disciplinary letters, corrective actions, skills assessments, retesting requirements, and public disclosure before formal adjudication has occurred. Impact on Represented	hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to

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			Employee Interpreters Many court interpreters are represented employees working under negotiated Memoranda of Understanding that contain disciplinary procedures, representation rights, grievance procedures, and due process protections. I am concerned that the proposed credential review process could be used to address issues that are already covered by existing disciplinary systems negotiated between courts and employee organizations. Credential review should not become an alternative pathway that bypasses established disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. If implementation of these procedures affects represented employees, the Judicial Council and courts should ensure that applicable meet-and-confer obligations are satisfied and that negotiated labor protections are respected. Requested Revisions I respectfully request that the Judicial Council: 1. Remove the provision authorizing public posting of disciplinary letters that have not been adjudicated through a formal hearing process. 2. Establish clear, objective, validated, and transparent standards for skills assessments. 3. Provide meaningful appeal rights and independent review of assessment results. 4. Clarify how environmental and courtroom conditions will be considered when evaluating interpreter performance. 5. Ensure that credential review procedures do not circumvent negotiated disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. 6. Preserve full due process protections before disciplinary actions become public. Include Union Representation in the Development and Oversight Process. The Judicial Council should include representatives of the California Federation of Interpreters and other interpreter stakeholders in the development, implementation, and ongoing review of the skills assessment and credential review process. Conclusion Court interpreters play a critical role in	evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). A skills assessment would not be required merely because a complaint is filed. It would be required only when the credential review process determines that an assessment is necessary to evaluate a legitimate concern regarding interpreting skills. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. No skills assessment or disciplinary action would be imposed

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			protecting access to justice and meaningful participation in judicial proceedings. Any system designed to evaluate interpreter competence or impose discipline should be fair, transparent, objective, and respectful of both professional standards and due process rights. I respectfully urge the Judicial Council to revise SP26-04 before adoption. Thank you for your consideration.	without supporting evidence. Once an assessment is appropriately required, participation is necessary for the Judicial Council to determine whether further action, remediation, or no action is warranted. The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. Credential review and trial court employment discipline serve distinct, though sometimes related, purposes. Trial courts remain responsible for addressing employment matters, including any applicable collective bargaining, representation, grievance, and due process requirements. These actions are focused on an interpreter's employment with the trial court. In contrast, the Judicial Council's credential review process is focused specifically on an interpreter's statewide credential and its

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				responsibility to maintain the integrity of that credential. While the same conduct may give rise to both employment-related and credentialing concerns, each process addresses a different interest and operates within its respective authority. The credential review process is not intended to replace, duplicate, or circumvent applicable employment processes or protections. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections.

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				The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.
21.	Nick Dragon	NI	Hello, I hope this email finds you well. Thank you for allowing us to share our concerns and doubts about the what it seems subjective unprofessional rating controversial system of BIE exam. The raters are already certified Arabic language court interpreters who provide interpreting service in CA and other states all over America which certainly raise conflict of interest issues. I myself and many other interpreters scored high in Court written exam and Arabic to English sight portion of the BIE, yet we failed all the sections that involved Arabic language! Arabic is our mother tongue and we all have bachelor degrees from different Arabic universities and there is no way for us to improve a language that we perfected for decades now. Failing Arabic portions only means that there is nothing to do to pass the said exam.	The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and

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				were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH).
22.	Ana K. Esquivel Certified Spanish Interpreter, Language Access Services, Superior Court of California, County of Los Angeles; Bellflower	AM	To the Judicial Council and Court Interpreters Advisory Panel: I am a California court interpreter and respectfully submit the following comments regarding SP26-04, Proposed Revisions to the California Court Interpreter Credential Review Procedures. I support maintaining high professional standards for court interpreters and agree that the public deserves qualified, ethical, and competent language access services. However, I have concerns regarding several aspects of the proposal. Due Process Concerns The proposal would allow the Court Interpreters Program (CIP) to issue disciplinary letters and publicly post information about those letters on an interpreter's	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second

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			Master List record without a formal hearing before the Office of Administrative Hearings or findings by an Administrative Law Judge. Because public disciplinary postings can significantly affect an interpreter's professional reputation and employment opportunities, I believe disciplinary actions should not become part of an interpreter's public record without full due process protections and independent review. Skills Assessments The proposal creates a mandatory skills assessment process but does not clearly define the evaluation standards, scoring criteria, appeal rights, or safeguards against subjective judgments. Court interpretation is performed in real time under challenging conditions that often include rapid speech, overlapping speakers, poor acoustics, unfamiliar terminology, and other communication barriers. Even highly qualified interpreters may occasionally encounter difficult circumstances that do not reflect a lack of competence. The proposal should clearly explain how evaluators will distinguish between true performance deficiencies and issues caused by courtroom conditions beyond an interpreter's control. Mandatory Participation and Discipline I am concerned that failure to participate in the assessment process could result in suspension or revocation proceedings. Before granting such authority, clear standards, review procedures, and meaningful appeal rights should be established. Impact on Represented Employees Many court interpreters are represented employees whose workplaces already have negotiated disciplinary procedures, grievance processes, representation rights, and due process protections. The credential review process should not become an alternative pathway that bypasses existing labor agreements or established disciplinary systems. Any implementation affecting represented employees should respect collective bargaining obligations and negotiated protections. Requested Revisions I respectfully request that the Judicial Council: * Eliminate public posting of disciplinary letters that have not been formally adjudicated. * Establish clear,	substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from

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			objective, and transparent standards for skills assessments. * Provide meaningful appeal rights and independent review. * Clarify how courtroom conditions will be considered when evaluating performance. * Ensure that credential review procedures do not circumvent existing disciplinary processes, union representation rights, or collective bargaining agreements. * Include interpreter stakeholders and union representatives in the development and oversight of the assessment and credential review process. Conclusion Court interpreters play a critical role in ensuring meaningful access to justice. Any process used to evaluate interpreter competence or impose discipline should be fair, transparent, objective, and protective of due process rights. I respectfully urge the Judicial Council to revise SP26-04 before adoption. Thank you for your consideration.	isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement.

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				It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). A skills assessment would not be required merely because a complaint is filed. It would be required only when the credential review process determines that an assessment is necessary to evaluate a legitimate concern regarding interpreting skills. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. No skills assessment or disciplinary action would be imposed without supporting evidence. Once an assessment is appropriately required, participation is necessary for the Judicial Council to determine whether further action, remediation, or no action is warranted. The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an

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				alleged violation of existing standards is substantiated. An allegation alone does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. Credential review and trial court employment discipline serve distinct, though sometimes related, purposes. Trial courts remain responsible for addressing employment matters, including any applicable collective bargaining, representation, grievance, and due process requirements. These actions are focused on an interpreter's employment with the trial court. In contrast, the Judicial Council's credential review process is focused specifically on an interpreter's statewide credential and its responsibility to maintain the integrity of that credential. While the same conduct may give rise to both employment-related and credentialing concerns, each process addresses a different interest and operates within its respective authority. The credential review process is not intended to replace, duplicate, or circumvent applicable employment processes or protections.

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				The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.
23.	Giovana Farias-Izmirlian California Court Certified Spanish Interpreter, Lexbridge (formerly Precise Language Services, Inc.)	N	Dear Members of the Court Interpreters Advisory Panel, I respectfully submit the following comments in opposition to the proposed revisions to the Court Interpreter Credential Review Process. While I support a fair and effective complaint process, I believe the current proposal requires important revisions to ensure due process and equitable treatment of credentialed interpreters. First, for complaints involving alleged misconduct, supporting	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do

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			evidence from the complainant should be **required** whenever a complaint is filed, rather than merely encouraged. Second, although the proposal states that interpreters will receive notice of the allegations, the date of the alleged incident, and the case file number, it does state that the interpreter will receive the evidence supporting the complaint. Interpreters should be provided with the evidence at the outset so they can adequately respond to the allegations. Third, under "Resolution Without Issuance of a Charging Document," the proposal should include dismissal of a complaint when the available evidence is insufficient to support the allegations. Fourth, the proposed skills assessment for competence-related complaints currently applies only to Spanish interpreters. This creates an inequitable system among credentialed interpreters. Either the same standards should apply to all credentialed languages, or they should not be implemented for only one language. Finally, while the Judicial Council's authority extends only to credentialed court interpreters, there appears to be no corresponding effort to address complaints involving non-credentialed interpreters who continue to provide court interpreting services. This creates a troubling disparity: credentialed interpreters, who have invested substantial time, effort, and resources to obtain and maintain their credentials, are subject to extensive oversight and discipline, while non-credentialed interpreters face no comparable accountability for misconduct, incompetence, or ethical violations. This undermines the value of credentialing and creates an inequitable regulatory system. The current proposal should be revised before implementation. Unless CIAP hears from certified and registered court interpreters, we risk adopting a disciplinary process that lacks important procedural safeguards and equitable standards. Thank you for your consideration.	not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when

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				a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two

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				evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented

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				employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined. The Credential Review Procedures apply specifically to California certified and registered court interpreters who hold a Judicial Council-issued credential and are included on the Judicial Council Master List. Accordingly, these procedures are intended to address matters that may affect an interpreter's credential and continued eligibility to maintain that credential. Oversight of non-credentialed or

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				provisionally qualified interpreters falls outside the scope of the Credential Review Procedures and is governed by other applicable trial court policies, Judicial Council program requirements, and related standards or procedures.
24.	Judy Feisthamel	AM	Dear decision makers, I've read the draft proposals that may need to be implemented against incompetent court interpreters. Here are a few concerns: 1. If disciplinary action needs to be taken against an interpreter, please apply this action to all interpreters, certified and noncertified (those that may potentially be at greater fault), even if these individuals are not on the public list. 2. If a skills assessment is warranted, then it should be applied to all languages, even those of lesser diffusion, and not just Spanish, the most commonly used language. 3. Posting disciplinary letters issued by CIP and posting them so they appear in the public record seems humiliating and unnecessary. Receiving a disciplinary letter should be punishment enough. (Next step for the interpreter at fault would probably be rectification of unwarranted conduct or departure from the profession.) I appreciate your time and efforts in developing clear steps towards addressing misconduct and thus maintaining a list of professional and competent interpreters.	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter

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				and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and

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				experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards

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				is substantiated. An allegation alone does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the

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				skills-assessment process is implemented, evaluated, and refined. The committee appreciates the concern regarding equitable application across all credentialed languages. The next draft will clarify that the same substantive threshold and procedural protections apply regardless of language and that the Judicial Council will make every effort to create a skills assessment process in every certified language as some are currently in development.
25.	Ada Freestone Certified Spanish Court Interpreter	A	Hello, I am in favor of the Revised Procedure. I had a very negative experience with an interpreter who had been certified for only about a year. When I attempted to correct errors in her interpretation though my employer's Court's policies, I was treated in the worst way possible. This took place in 2025. This interpreter apologized to me this year 2026 and stated to me that she thought that I was "going for her certification", when in fact, I was willing to take the fall for her and make the corrections myself. No one should go through what I went through, and my biggest concern is retaliation from interpreters who get reported or even if attempts are made to assist in correcting their errors. I would like to see a clause that retaliation against a reporting party will not be tolerated. I feel it is too bad that a decision was made years ago to make the exams easier to pass. We do have some people among us who study only for an exam. Having a badge and dressing professional does not make us all competent. I listened in at the hearing held on May 13, 2026 and was in disbelief that a couple of people made comments referring to how difficult the exam is and that suggestions were made to make it even easier. Even interpreters who have been certified for many years, get set in their ways and there is a level of conformism with their renditions, that I find hard to understand, but I	All submissions made through the credential review process are treated as confidential in accordance with the Credential Review Procedures and applicable requirements. To further support the integrity of the process and encourage good-faith participation, CIP will add narrowly tailored language clarifying that retaliation against individuals for good-faith participation in the credential review process is prohibited, subject to applicable law and Judicial Council authority. **Recommended draft location**: Section G or a general procedural-protections provision.

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			am a perfectionist. Thank you for your time and dedication to making us court interpreters better at what we do.	
26.	René M. García County of Los Angeles Superior Court; Sherman Oaks	N	To the Judicial Council and Court Interpreters Advisory Panel: I am a California court interpreter and respectfully submit the following comments regarding SP26-04, Proposed Revisions to the California Court Interpreter Credential Review Procedures. I support maintaining high professional standards for court interpreters and believe that the public deserves qualified, ethical, and competent language access services. However, I have serious concerns regarding several aspects of the proposed changes. Public Disciplinary Letters Without Formal Due Process The proposal authorizes the Court Interpreters Program (CIP) to issue disciplinary letters and publicly post the subject and terms of those letters on an interpreter's Master List record. This is concerning because a disciplinary letter could become part of an interpreter's permanent public professional record without a hearing before the Office of Administrative Hearings, without findings by an Administrative Law Judge, and without the procedural protections traditionally associated with formal discipline. A public disciplinary posting can affect an interpreter's professional reputation, future employment opportunities, and standing within the profession. Such consequences should not occur without full due process protections and independent review. Unclear Standards for Skills Assessments The proposal creates a mandatory skills assessment process but does not clearly identify the standards by which interpreters will be evaluated. California's credentialing system already establishes the qualifications necessary to become a certified or registered court interpreter. The proposal appears to create a new layer of evaluation without clearly identifying the performance standard, scoring criteria, appeal rights, evaluator accountability, or protections against subjective judgments. Court interpretation is a highly complex profession performed in real time under constantly changing conditions. Unlike a controlled testing	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter

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			environment, interpreters routinely work through background noise, overlapping speakers, poor acoustics, low-volume speakers, rapid speech, trailing words, incomplete sentences, regional accents, emotional testimony, legal terminology, terms of art, and unexpected subject matter. Judges, attorneys, witnesses, and litigants often speak at speeds significantly faster than normal conversational speech. Interpreters frequently raise concerns regarding these communication barriers and environmental impediments, yet those concerns are not always addressed before interpretation continues. Even highly skilled interpreters may occasionally encounter unfamiliar terminology, momentary word-retrieval difficulties, or difficult speech patterns. These realities are inherent in court interpretation and do not necessarily indicate incompetence. The proposal does not adequately explain how evaluators will distinguish between genuine deficiencies in an interpreter's knowledge, skills, and abilities and isolated performance issues caused by difficult courtroom conditions. Mandatory Participation and Potential Discipline The proposal states that participation in the skills assessment process is mandatory and that failure to participate may lead to suspension and possible revocation proceedings. I am concerned that an interpreter could face disciplinary consequences based on a dispute regarding participation in the assessment process itself rather than proven misconduct or incompetence. Before such authority is granted, the Judicial Council should establish clear standards, appeal rights, review procedures, and safeguards to ensure fairness and consistency. Broad Expansion of Rule 2.890 Allegations The proposal also expands the potential use of allegations under California Rule of Court 2.890. Rule 2.890 covers broad areas of professional conduct including accuracy, impartiality, confidentiality, conflicts of interest, professional demeanor, and duties to the court. As written, a wide range of alleged conduct could potentially result in disciplinary letters, corrective actions, skills assessments, retesting	on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and

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			requirements, and public disclosure before formal adjudication has occurred. Impact on Represented Employee Interpreters Many court interpreters are represented employees working under negotiated Memoranda of Understanding that contain disciplinary procedures, representation rights, grievance procedures, and due process protections. I am concerned that the proposed credential review process could be used to address issues that are already covered by existing disciplinary systems negotiated between courts and employee organizations. Credential review should not become an alternative pathway that bypasses established disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. If implementation of these procedures affects represented employees, the Judicial Council and courts should ensure that applicable meet-and-confer obligations are satisfied and that negotiated labor protections are respected. Requested Revisions I respectfully request that the Judicial Council: Remove the provision authorizing public posting of disciplinary letters that have not been adjudicated through a formal hearing process. Establish clear, objective, validated, and transparent standards for skills assessments. Provide meaningful appeal rights and independent review of assessment results. Clarify how environmental and courtroom conditions will be considered when evaluating interpreter performance. Ensure that credential review procedures do not circumvent negotiated disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. Preserve full due process protections before disciplinary actions become public. Include Union Representation in the Development and Oversight Process. The Judicial Council should include representatives of the California Federation of Interpreters and other interpreter stakeholders in the development, implementation, and ongoing review of the skills	practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). A skills assessment would not be required merely because a complaint is filed. It would be required only when the credential review process determines that an assessment is necessary to evaluate a legitimate concern regarding interpreting skills. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. No skills assessment or

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			assessment and credential review process. Conclusion Court interpreters play a critical role in protecting access to justice and meaningful participation in judicial proceedings. Any system designed to evaluate interpreter competence or impose discipline should be fair, transparent, objective, and respectful of both professional standards and due process rights. I respectfully urge the Judicial Council to revise SP26-04 before adoption. Thank you for your consideration.	disciplinary action would be imposed without supporting evidence. Once an assessment is appropriately required, participation is necessary for the Judicial Council to determine whether further action, remediation, or no action is warranted. The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. Credential review and trial court employment discipline serve distinct, though sometimes related, purposes. Trial courts remain responsible for addressing employment matters, including any applicable collective bargaining, representation, grievance, and due process requirements. These actions are focused on an interpreter's employment with the trial court. In contrast, the Judicial Council's credential review process is focused specifically on an interpreter's

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				statewide credential and its responsibility to maintain the integrity of that credential. While the same conduct may give rise to both employment-related and credentialing concerns, each process addresses a different interest and operates within its respective authority. The credential review process is not intended to replace, duplicate, or circumvent applicable employment processes or protections. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections.

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				The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.
27.	Viviana Gardea California Certified Court Interpreter, Spanish, County of Riverside	AM	To the Judicial Council and Court Interpreters Advisory Panel: As a California court interpreter, I would like to respectfully express my comments and concerns regarding SP26-04, Proposed Revisions to the California Court Interpreter Credential Review Procedures. I believe wholeheartedly that the public has a right to have qualified, ethical, unbiased, competent language access during court proceedings and believe that court interpreters must have high professional standards and ethics. The concerns I have regarding SP26-04 is that there seems to be no due process when it comes to the Disciplinary Letters that will be made public and can influence negatively an interpreter's career in the future. As previously mentioned, one concern is lack of due process protections, will the interpreter be allowed to provide a defense or explain the circumstances of the event that caused the filing of a complaint? Will an interpreter's union be allowed to support and represent said interpreter during the proceedings leading up to the Disciplinary letter? A second concern of mine is the standards that will be used when disciplining an interpreter, what will these standards entail? As a Certified court interpreter, I already abide by strict standards and qualifications, and these standards have been established by California's credentialing body and continue to follow the stringent requirements to maintain my credentials. The proposed skills assessment creates another layer of evaluation without any details on criteria for scoring, performance standards, potential protections against subjective judgement or performance standards. I also question if these standards will also apply to noncertified interpreters that also work in the court system, will these interpreters also be subject to these standards? There is no explanation as to how complaints will be evaluated and	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to

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			addressed. Will the interpreter be allowed the opportunity to explain the working conditions when a complaint is filed? When interpreting in a courtroom setting there are multiple factors that can influence an interpreter's interpretation, there is the public around an interpreter having conversations near or around the interpreter, attorney's conferencing with their clients, loud noises, multiple people talking at once, poor microphone connection or lack of use of a microphone. These and many other environmental factors influence in interpreters' ability to interpret and should be considered during the disciplinary action. Not being able to hear properly or asking for a repetition are not signs of an interpreter's lack of knowledge, skills, or their abilities as an interpreter. I also fear that my rights as a represented interpreted will be impacted. Will a represented interpreter that already follows a Memoranda of Understanding that includes disciplinary actions and procedures, representation rights, grievance procedures, just-cause safeguards and other protections to due process be disciplined both by the employer and the Court Interpreters Program? As previously stated, I support maintaining high professional standards for court interpreters. I believe in the public's right to have access to qualified, ethical, and competent language services. I also believe that the Judicial council should preserve full due process protections before public disciplinary actions are imposed. Forgo the public posting of a disciplinary letter that is not adjudicated through a formal hearing. Put in place appeal rights regarding assessment findings and provide clear, objective and transparent standards for the skills assessments. Take into consideration and clarify how environmental and courtroom factors will be considered when evaluating interpreter performance. Provide support against the use of credential review procedures as a substitute for established workplace disciplinary processes. Guarantee that credential review procedures do not bypass negotiated disciplinary procedures, union representation rights, grievance	OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed

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			procedures, or other protections under collective bargaining agreements. Certified court interpreters have an important role when it comes to providing justice and equal access to judicial proceedings. The evaluation of an interpreter's competence, ability, and skills needs to be fair and transparent and respect due process rights. Respectfully, SP26-04 needs to be revised before adoption. I respectfully urge the Judicial Council to reconsider the adoption of SP26-04 until the proper revisions have been applied. Thank you for your time and consideration.	by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone does not establish a violation or

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				automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. Credential review and trial court employment discipline serve distinct, though sometimes related, purposes. Trial courts remain responsible for addressing employment matters, including any applicable collective bargaining, representation, grievance, and due process requirements. These actions are focused on an interpreter's employment with the trial court. In contrast, the Judicial Council's credential review process is focused specifically on an interpreter's statewide credential and its responsibility to maintain the integrity of that credential. While the same conduct may give rise to both employment-related and credentialing concerns, each process addresses a different interest and operates within its respective authority. The credential review process is not intended to replace, duplicate, or circumvent applicable employment processes or protections. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors,

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				review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.
28.	Alessandra Bonatti Harabin Court Interpreter 900015	AM	I am writing in regards to the CIAP's revision to the Interpreter Complaint Process. The following are the observations I would like to submit to this body: 1. For complaints related to misconduct, evidence from the complainant is encouraged when available, but not required (it should be). 2. If a request for a credential review meets "the jurisdictional requirements," the interpreter would be provided a notice with a summary of the allegation(s), the date the allegation(s) took place, and the case file number of the case interpreted, if available or applicable (page 5). The proposal does not mention providing the interpreter with the evidence that supports	The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions,

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			the complaint against him or her at this point (it should be provided). 3. Under "Resolution Without Issuance of a Charging Document" (page 8), none of the options listed include a charging document not being issued due to evidence being insufficient to support the complaint (this option should be included). 4. Although the proposed complaint process for misconduct would apply to interpreters of all credentialed languages, the skills assessment applies only to Spanish for now. This creates a disparity among credentialed interpreters. In our opinion, either all interpreters should be subject to discipline regardless of language, or none should be. 5. Finally, although we recognize that the Judicial Council's authority extends only to credentialed court interpreters, no corresponding effort appears to be under consideration to address complaints involving non-credentialed interpreters. These individuals continue to perform interpreting services in court despite California law credentialing requirements, yet they appear to be insulated from any comparable system of accountability for misconduct, incompetence, or ethical violations. This creates another troubling disparity in which credentialed interpreters —who have invested significant time and effort to obtain and maintain their credentials, comply with continuing requirements, and pay annual renewal fees— are subject to scrutiny and disciplinary measures, while uncredentialed interpreters face no equivalent oversight. Such a result undermines the value of credentialing, erodes confidence in the regulatory framework, and creates an inequitable system that rewards noncompliance rather than professional accountability. The current proposal needs revisions. Certified and registered court interpreters will be subject to a flawed disciplinary process under these rules.	such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine

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				whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). The committee appreciates the concern regarding equitable application across all credentialed languages. The next draft will clarify that the same substantive threshold and procedural protections apply regardless of language and that the Judicial Council will make every effort to create a skills assessment process in every certified language as some are currently in development. The Credential Review Procedures apply specifically to California certified and registered court interpreters who hold a Judicial Council-issued credential and are included on the Judicial Council Master List. Accordingly, these procedures are intended to address matters that may affect an interpreter's credential and continued eligibility to maintain that credential. Oversight of non-credentialed or provisionally qualified interpreters falls outside the scope of the Credential Review Procedures and is governed by other applicable trial

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				court policies, Judicial Council program requirements, and related standards or procedures.
29.	Pablo Henonin California Court Certified Interpreter	AM	To whom it may concern, Thank you for proposing a review of our professional standards. While I advocate a high level of quality in the performance of interpreting services in legal matters; I think that this proposal is not completely equitable, since it would only include scrutiny of the work performed by credentialed interpreters; and initially only in the Spanish language. I think the program should be implemented only when all interpreters that perform legal interpretation within the system can be included. This would encompass all certified and registered languages and also non-credentialed interpreters, as applicable.	The Credential Review Procedures apply specifically to California certified and registered court interpreters who hold a Judicial Council-issued credential and are included on the Judicial Council Master List. Accordingly, these procedures are intended to address matters that may affect an interpreter's credential and continued eligibility to maintain that credential. Oversight of non-credentialed or provisionally qualified interpreters falls outside the scope of the Credential Review Procedures and is governed by other applicable trial court policies, Judicial Council program requirements, and related standards or procedures.
30.	Kimberly Hernandez Court Interpreter	AM	To the Judicial Council and Court Interpreters Advisory Panel: I am a California court interpreter and respectfully submit the following comments regarding SP26-04, Proposed Revisions to the California Court Interpreter Credential Review Procedures. I support maintaining high professional standards for court interpreters and believe that the public deserves qualified, ethical, and competent language access services. However, I have serious concerns regarding several aspects of the proposed changes. Public Disciplinary Letters Without Formal Due Process The proposal authorizes the Court Interpreters Program (CIP) to issue disciplinary letters and publicly post the subject and terms of those letters on an interpreter's Master List record. This is concerning because a disciplinary letter could become part of an interpreter's permanent public professional record without a hearing	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct.

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			before the Office of Administrative Hearings, without findings by an Administrative Law Judge, and without the procedural protections traditionally associated with formal discipline. A public disciplinary posting can affect an interpreter's professional reputation, future employment opportunities, and standing within the profession. Such consequences should not occur without full due process protections and independent review. Unclear Standards for Skills Assessments The proposal creates a mandatory skills assessment process but does not clearly identify the standards by which interpreters will be evaluated. California's credentialing system already establishes the qualifications necessary to become a certified or registered court interpreter. The proposal appears to create a new layer of evaluation without clearly identifying the performance standard, scoring criteria, appeal rights, evaluator accountability, or protections against subjective judgments. Court interpretation is a highly complex profession performed in real time under constantly changing conditions. Unlike a controlled testing environment, interpreters routinely work through background noise, overlapping speakers, poor acoustics, low-volume speakers, rapid speech, trailing words, incomplete sentences, regional accents, emotional testimony, legal terminology, terms of art, and unexpected subject matter. Judges, attorneys, witnesses, and litigants often speak at speeds significantly faster than normal conversational speech. Interpreters frequently raise concerns regarding these communication barriers and environmental impediments, yet those concerns are not always addressed before interpretation continues. Even highly skilled interpreters may occasionally encounter unfamiliar terminology, momentary word-retrieval difficulties, or difficult speech patterns. These realities are inherent in court interpretation and do not necessarily indicate incompetence. The proposal does not adequately explain how evaluators will distinguish between genuine deficiencies in an interpreter's knowledge, skills, and	A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech,

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			abilities and isolated performance issues caused by difficult courtroom conditions. Mandatory Participation and Potential Discipline The proposal states that participation in the skills assessment process is mandatory and that failure to participate may lead to suspension and possible revocation proceedings. I am concerned that an interpreter could face disciplinary consequences based on a dispute regarding participation in the assessment process itself rather than proven misconduct or incompetence. Before such authority is granted, the Judicial Council should establish clear standards, appeal rights, review procedures, and safeguards to ensure fairness and consistency. Broad Expansion of Rule 2.890 Allegations The proposal also expands the potential use of allegations under California Rule of Court 2.890. Rule 2.890 covers broad areas of professional conduct including accuracy, impartiality, confidentiality, conflicts of interest, professional demeanor, and duties to the court. As written, a wide range of alleged conduct could potentially result in disciplinary letters, corrective actions, skills assessments, retesting requirements, and public disclosure before formal adjudication has occurred. Impact on Represented Employee Interpreters Many court interpreters are represented employees working under negotiated Memoranda of Understanding that contain disciplinary procedures, representation rights, grievance procedures, and due process protections. I am concerned that the proposed credential review process could be used to address issues that are already covered by existing disciplinary systems negotiated between courts and employee organizations. Credential review should not become an alternative pathway that bypasses established disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. If implementation of these procedures affects represented employees, the Judicial Council and courts should ensure that applicable meet-and-confer obligations are satisfied and that	poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine

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			negotiated labor protections are respected. Requested Revisions I respectfully request that the Judicial Council: Remove the provision authorizing public posting of disciplinary letters that have not been adjudicated through a formal hearing process. Establish clear, objective, validated, and transparent standards for skills assessments. Provide meaningful appeal rights and independent review of assessment results. Clarify how environmental and courtroom conditions will be considered when evaluating interpreter performance. Ensure that credential review procedures do not circumvent negotiated disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. Preserve full due process protections before disciplinary actions become public. Include Union Representation in the Development and Oversight Process. The Judicial Council should include representatives of the California Federation of Interpreters and other interpreter stakeholders in the development, implementation, and ongoing review of the skills assessment and credential review process. Conclusion Court interpreters play a critical role in protecting access to justice and meaningful participation in judicial proceedings. Any system designed to evaluate interpreter competence or impose discipline should be fair, transparent, objective, and respectful of both professional standards and due process rights. I respectfully urge the Judicial Council to revise SP26-04 before adoption. Thank you for your consideration.	whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). A skills assessment would not be required merely because a complaint is filed. It would be required only when the credential review process determines that an assessment is necessary to evaluate a legitimate concern regarding interpreting skills. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. No skills assessment or disciplinary action would be imposed without supporting evidence. Once an assessment is appropriately required, participation is necessary for the Judicial Council to determine whether further action, remediation, or no action is warranted. The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone

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				does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. Credential review and trial court employment discipline serve distinct, though sometimes related, purposes. Trial courts remain responsible for addressing employment matters, including any applicable collective bargaining, representation, grievance, and due process requirements. These actions are focused on an interpreter's employment with the trial court. In contrast, the Judicial Council's credential review process is focused specifically on an interpreter's statewide credential and its responsibility to maintain the integrity of that credential. While the same conduct may give rise to both employment-related and credentialing concerns, each process addresses a different interest and operates within its respective authority. The credential review process is not intended to replace, duplicate, or circumvent applicable employment processes or protections. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment

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				standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.
31.	Ines Horovitz California Certified Court Interpreter, Spanish	AM	To the Judicial Council and Court Interpreters Advisory Panel: I am a California court interpreter and respectfully submit the following comments regarding SP26-04, Proposed Revisions to the California Court Interpreter Credential Review Procedures. I support maintaining high professional standards for court interpreters and believe that the public deserves qualified, ethical, and competent language access services. However, I have serious concerns regarding several aspects of the proposed changes. Public Disciplinary Letters Without Formal Due Process The proposal authorizes the Court Interpreters	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate

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			Program (CIP) to issue disciplinary letters and publicly post the subject and terms of those letters on an interpreter's Master List record. This is concerning because a disciplinary letter could become part of an interpreter's permanent public professional record without a hearing before the Office of Administrative Hearings, without findings by an Administrative Law Judge, and without the procedural protections traditionally associated with formal discipline. A public disciplinary posting can affect an interpreter's professional reputation, future employment opportunities, and standing within the profession. Such consequences should not occur without full due process protections and independent review. Unclear Standards for Skills Assessments The proposal creates a mandatory skills assessment process but does not clearly identify the standards by which interpreters will be evaluated. California's credentialing system already establishes the qualifications necessary to become a certified or registered court interpreter. The proposal appears to create a new layer of evaluation without clearly identifying the performance standard, scoring criteria, appeal rights, evaluator accountability, or protections against subjective judgments. Court interpretation is a highly complex profession performed in real time under constantly changing conditions. Unlike a controlled testing environment, interpreters routinely work through background noise, overlapping speakers, poor acoustics, low-volume speakers, rapid speech, trailing words, incomplete sentences, regional accents, emotional testimony, legal terminology, terms of art, and unexpected subject matter. Judges, attorneys, witnesses, and litigants often speak at speeds significantly faster than normal conversational speech. Interpreters frequently raise concerns regarding these communication barriers and environmental impediments, yet those concerns are not always addressed before interpretation continues. Even highly skilled interpreters may occasionally encounter unfamiliar terminology, momentary word-retrieval	when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish

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			difficulties, or difficult speech patterns. These realities are inherent in court interpretation and do not necessarily indicate incompetence. The proposal does not adequately explain how evaluators will distinguish between genuine deficiencies in an interpreter's knowledge, skills, and abilities and isolated performance issues caused by difficult courtroom conditions. Mandatory Participation and Potential Discipline The proposal states that participation in the skills assessment process is mandatory and that failure to participate may lead to suspension and possible revocation proceedings. I am concerned that an interpreter could face disciplinary consequences based on a dispute regarding participation in the assessment process itself rather than proven misconduct or incompetence. Before such authority is granted, the Judicial Council should establish clear standards, appeal rights, review procedures, and safeguards to ensure fairness and consistency. Broad Expansion of Rule 2.890 Allegations The proposal also expands the potential use of allegations under California Rule of Court 2.890. Rule 2.890 covers broad areas of professional conduct including accuracy, impartiality, confidentiality, conflicts of interest, professional demeanor, and duties to the court. As written, a wide range of alleged conduct could potentially result in disciplinary letters, corrective actions, skills assessments, retesting requirements, and public disclosure before formal adjudication has occurred. Impact on Represented Employee Interpreters Many court interpreters are represented employees working under negotiated Memoranda of Understanding that contain disciplinary procedures, representation rights, grievance procedures, and due process protections. I am concerned that the proposed credential review process could be used to address issues that are already covered by existing disciplinary systems negotiated between courts and employee organizations. Credential review should not become an alternative pathway that bypasses established disciplinary procedures, union representation rights,	genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and

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			grievance procedures, or other protections contained in collective bargaining agreements. If implementation of these procedures affects represented employees, the Judicial Council and courts should ensure that applicable meet-and-confer obligations are satisfied and that negotiated labor protections are respected. Requested Revisions I respectfully request that the Judicial Council: 1. Remove the provision authorizing public posting of disciplinary letters that have not been adjudicated through a formal hearing process. 2. Establish clear, objective, validated, and transparent standards for skills assessments. 3. Provide meaningful appeal rights and independent review of assessment results. 4. Clarify how environmental and courtroom conditions will be considered when evaluating interpreter performance. 5. Ensure that credential review procedures do not circumvent negotiated disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. 6. Preserve full due process protections before disciplinary actions become public. Include Union Representation in the Development and Oversight Process. The Judicial Council should include representatives of the California Federation of Interpreters and other interpreter stakeholders in the development, implementation, and ongoing review of the skills assessment and credential review process. Conclusion Court interpreters play a critical role in protecting access to justice and meaningful participation in judicial proceedings. Any system designed to evaluate interpreter competence or impose discipline should be fair, transparent, objective, and respectful of both professional standards and due process rights. I respectfully urge the Judicial Council to revise SP26-04 before adoption. Thank you for your consideration.	areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). A skills assessment would not be required merely because a complaint is filed. It would be required only when the credential review process determines that an assessment is necessary to evaluate a legitimate concern regarding interpreting skills. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. No skills assessment or disciplinary action would be imposed without supporting evidence. Once an assessment is appropriately required, participation is necessary for the Judicial Council to determine whether further action, remediation, or no action is warranted. The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of

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				proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. Credential review and trial court employment discipline serve distinct, though sometimes related, purposes. Trial courts remain responsible for addressing employment matters, including any applicable collective bargaining, representation, grievance, and due process requirements. These actions are focused on an interpreter's employment with the trial court. In contrast, the Judicial Council's credential review process is focused specifically on an interpreter's statewide credential and its responsibility to maintain the integrity of that credential. While the same conduct may give rise to both employment-related and credentialing concerns, each process addresses a different interest and operates within its respective authority. The credential review process is not intended to replace, duplicate, or circumvent applicable employment processes or protections.

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				The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.
32.	Norman Howard Public commenter	NI	The problem with using something like the public defender eligibility declaration, based on my 30-year experience as a PD is there was zero verification of the provided information. The thousands of declarations I saw stated "few or no assets "of any kind, about 95% of the time. No verification was ever required, even when signed under penalty of perjury. So with the proposed bail form. Most likely, most in custody defendants will quickly sign them	The comment is outside the scope of SP26-04; no change to the Credential Review Procedures is recommended in response.

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			as indigent, perhaps hearing that could expedite release, and with no verification, they are not that probative. Verification of some sort is needed.	
33.	Krischna Izarra California Certified Spanish Court Interpreter; Merced	AM	To the Judicial Council and Court Interpreters Advisory Panel: I am a California court interpreter and respectfully submit the following comments regarding SP26-04, Proposed Revisions to the California Court Interpreter Credential Review Procedures. I support maintaining high professional standards for court interpreters and believe that the public deserves qualified, ethical, and competent language access services. However, I have serious concerns regarding several aspects of the proposed changes. Public Disciplinary Letters Without Formal Due Process The proposal authorizes the Court Interpreters Program (CIP) to issue disciplinary letters and publicly post the subject and terms of those letters on an interpreter's Master List record. This is concerning because a disciplinary letter could become part of an interpreter's permanent public professional record without a hearing before the Office of Administrative Hearings, without findings by an Administrative Law Judge, and without the procedural protections traditionally associated with formal discipline. A public disciplinary posting can affect an interpreter's professional reputation, future employment opportunities, and standing within the profession. Such consequences should not occur without full due process protections and independent review. Unclear Standards for Skills Assessments The proposal creates a mandatory skills assessment process but does not clearly identify the standards by which interpreters will be evaluated. California's credentialing system already establishes the qualifications necessary to become a certified or registered court interpreter. The proposal appears to create a new layer of evaluation without clearly identifying the performance standard, scoring criteria, appeal rights, evaluator accountability, or protections against subjective judgments. Court interpretation is a highly complex profession performed in real time under constantly	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the

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			changing conditions. Unlike a controlled testing environment, interpreters routinely work through background noise, overlapping speakers, poor acoustics, low-volume speakers, rapid speech, trailing words, incomplete sentences, regional accents, emotional testimony, legal terminology, terms of art, and unexpected subject matter. Judges, attorneys, witnesses, and litigants often speak at speeds significantly faster than normal conversational speech. Interpreters frequently raise concerns regarding these communication barriers and environmental impediments, yet those concerns are not always addressed before interpretation continues. Even highly skilled interpreters may occasionally encounter unfamiliar terminology, momentary word-retrieval difficulties, or difficult speech patterns. These realities are inherent in court interpretation and do not necessarily indicate incompetence. The proposal does not adequately explain how evaluators will distinguish between genuine deficiencies in an interpreter's knowledge, skills, and abilities and isolated performance issues caused by difficult courtroom conditions. Mandatory Participation and Potential Discipline The proposal states that participation in the skills assessment process is mandatory and that failure to participate may lead to suspension and possible revocation proceedings. I am concerned that an interpreter could face disciplinary consequences based on a dispute regarding participation in the assessment process itself rather than proven misconduct or incompetence. Before such authority is granted, the Judicial Council should establish clear standards, appeal rights, review procedures, and safeguards to ensure fairness and consistency. Broad Expansion of Rule 2.890 Allegations The proposal also expands the potential use of allegations under California Rule of Court 2.890. Rule 2.890 covers broad areas of professional conduct including accuracy, impartiality, confidentiality, conflicts of interest, professional demeanor, and duties to the court. As written, a wide range of alleged conduct could potentially result in disciplinary	matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and

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			letters, corrective actions, skills assessments, retesting requirements, and public disclosure before formal adjudication has occurred. Impact on Represented Employee Interpreters Many court interpreters are represented employees working under negotiated Memoranda of Understanding that contain disciplinary procedures, representation rights, grievance procedures, and due process protections. I am concerned that the proposed credential review process could be used to address issues that are already covered by existing disciplinary systems negotiated between courts and employee organizations. Credential review should not become an alternative pathway that bypasses established disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. If implementation of these procedures affects represented employees, the Judicial Council and courts should ensure that applicable meet-and-confer obligations are satisfied and that negotiated labor protections are respected. Requested Revisions I respectfully request that the Judicial Council: Remove the provision authorizing public posting of disciplinary letters that have not been adjudicated through a formal hearing process. Establish clear, objective, validated, and transparent standards for skills assessments. Provide meaningful appeal rights and independent review of assessment results. Clarify how environmental and courtroom conditions will be considered when evaluating interpreter performance. Ensure that credential review procedures do not circumvent negotiated disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. Preserve full due process protections before disciplinary actions become public. Include Union Representation in the Development and Oversight Process. The Judicial Council should include representatives of the California Federation of Interpreters and other interpreter stakeholders in the development,	were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). A skills assessment would not be required merely because a complaint is filed. It would be required only when the credential review process determines that an assessment is necessary to evaluate a legitimate concern regarding interpreting skills. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is

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			implementation, and ongoing review of the skills assessment and credential review process. Conclusion Court interpreters play a critical role in protecting access to justice and meaningful participation in judicial proceedings. Any system designed to evaluate interpreter competence or impose discipline should be fair, transparent, objective, and respectful of both professional standards and due process rights. I respectfully urge the Judicial Council to revise SP26-04 before adoption. Thank you for your consideration.	made. No skills assessment or disciplinary action would be imposed without supporting evidence. Once an assessment is appropriately required, participation is necessary for the Judicial Council to determine whether further action, remediation, or no action is warranted. The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. Credential review and trial court employment discipline serve distinct, though sometimes related, purposes. Trial courts remain responsible for addressing employment matters, including any applicable collective bargaining, representation, grievance, and due process requirements. These actions are focused on an interpreter's employment with the trial court. In contrast, the Judicial Council's credential review process is focused

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				specifically on an interpreter's statewide credential and its responsibility to maintain the integrity of that credential. While the same conduct may give rise to both employment-related and credentialing concerns, each process addresses a different interest and operates within its respective authority. The credential review process is not intended to replace, duplicate, or circumvent applicable employment processes or protections. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while

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				preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.
34.	Judy Jenner Federally certified Spanish court interpreter; court-registered German interpreter; Twin Translations	AM	The problem with using something like the public defender eligibility declaration , based on my 30 year experience as a PD is there was zero verification of the provided information . The thousands of declarations I saw stated " few or no assets " of any kind , about 95 % of the time . No verification was ever required , even when signed under penalty of perjury. So with the proposed bail form . Most likely , most in custody defendants will quickly sign them as indigent , perhaps hearing that could expedite release , and with no verification , they are not that probative. Verification of some sort is needed .	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter

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				The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. No skills assessment or disciplinary action would be imposed without supporting evidence. Once an assessment is appropriately required, participation is necessary for the Judicial Council to determine whether further action, remediation, or no action is warranted. The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. Credential review and trial court employment discipline serve distinct, though sometimes related, purposes. Trial courts remain responsible for addressing employment matters, including any applicable collective bargaining, representation, grievance, and due process requirements. These

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				actions are focused on an interpreter's employment with the trial court. In contrast, the Judicial Council's credential review process is focused specifically on an interpreter's statewide credential and its responsibility to maintain the integrity of that credential. While the same conduct may give rise to both employment-related and credentialing concerns, each process addresses a different interest and operates within its respective authority. The credential review process is not intended to replace, duplicate, or circumvent applicable employment processes or protections. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to

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35.	Jacquelene Kamel Agban California Certified Court Interpreter, Arabic; Santa Clarita	AM	To the Judicial Council and Court Interpreters Advisory Panel: Comments Regarding SP26-04 – Proposed Revisions to the California Court Interpreter Credential Review Procedures I am a California court interpreter and respectfully submit the following comments regarding SP26-04, the proposed revisions to the California Court Interpreter Credential Review Procedures. I support maintaining high professional standards for court interpreters and agree that the public deserves qualified, ethical, and competent language access services. However, I have significant concerns regarding several aspects of the proposed revisions. The proposal authorizes the Court Interpreters Program (CIP) to issue disciplinary letters and publicly post both the subject and terms of those letters on an interpreter's Master List record. This provision is concerning because a disciplinary letter could become part of an interpreter's permanent public professional record without a hearing before the Office of Administrative Hearings, without findings by an Administrative Law Judge, and without the procedural safeguards traditionally associated with formal disciplinary proceedings. Public disclosure of disciplinary actions can significantly affect an interpreter's professional reputation, future employment opportunities, and standing within the profession. Such consequences should not occur unless they follow a fair process that includes independent review and full due process protections. The proposal establishes a mandatory skills assessment process but does not clearly define the	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter’s credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to

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			standards by which interpreters will be evaluated. California's existing credentialing system already establishes the qualifications required to become a certified or registered court interpreter. The interpreters already go through a rigorous path of studying and practicing to get certified and then comply with CEUs to renew the certification. There is even a shortage due to the challenge of passing the test. This review presents more stress on certified interpreters while leaving those who falsify credentials without being held accountable; even if they are more liable to make mistakes. Interpreters could also "mishear" or "misunderstand" versus "misinterpret". This could happen to English speakers. It happens all the time in court hearings between judges and attorneys with no language barriers. An LEP could say:"This is not what I meant to say although this is what he said. Another thing is that interpreters are needed from one courtroom to another to quickly handle different matters with no enough background. They handle different accents, different dialects, different cultures and words that have no equivelance for them in the target language. Everyone in court need to have orientation about the exact role of the interpreter. Some have high expectations thinking that the interpreter is there to take the role of the attorney explaining for them what to do and when they realize that it is unethical for the interpreter to do that, they get disappointed. Furthermore, it is well-known that interpreters are scapegoats for attorneys and their clients to make excuses for their mistakes. Also a lot happens during attorney client interviews that is not on the record. It could end up with "the attorney said" versus "the interpreter said". This presents huge pressure on the interpreters because they are not attorneys. I know many professional highly qualified interpreters who fear being challenged by attorneys. There are also defendants who could act in bad faith or ill intent. they are ready to say anything, falsely accuse interpreters to get away with changing their testimony. Moreover, there are LEPs who speak some	provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for

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			english and think that there is only one interpretation that they object to any other synonym. Also the proposal appears to introduce an additional level of evaluation without identifying the applicable performance standards, scoring methodology, evaluator qualifications, appeal procedures, or safeguards against subjective evaluations. Court interpretation is a highly specialized profession performed in real time under constantly changing courtroom conditions. Unlike a controlled testing environment, interpreters routinely contend with background noise, overlapping speakers, poor acoustics, low-volume voices, rapid speech, incomplete sentences, trailing words, regional accents, emotional testimony, legal terminology, technical language, and unexpected subject matter. Judges, attorneys, witnesses, and litigants frequently speak at speeds well beyond ordinary conversational pace. Although interpreters regularly advise the court when communication barriers interfere with accurate interpretation, those concerns are not always addressed before proceedings continue. Even highly qualified interpreters may occasionally encounter unfamiliar terminology, difficult speech patterns, or momentary word-retrieval challenges. These situations are inherent to courtroom interpretation and do not necessarily reflect a lack of competence. The proposal does not explain how evaluators will distinguish between genuine deficiencies in an interpreter's knowledge, skills, and abilities and isolated performance issues caused by challenging courtroom conditions. The proposal makes participation in the skills assessment process mandatory and provides that failure to participate may result in suspension and possible revocation proceedings. I am concerned that an interpreter could face disciplinary consequences based solely on a disagreement regarding participation in the assessment process rather than proven misconduct or demonstrated incompetence. Before granting such authority, the Judicial Council should establish clear standards, meaningful appeal rights,	court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). A skills assessment would not be required merely because a complaint is filed. It would be required only when the credential review process

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			independent review procedures, and appropriate safeguards to ensure fairness, consistency, and accountability. The proposal also expands the potential use of allegations under California Rule of Court 2.890. Rule 2.890 encompasses broad professional responsibilities, including accuracy, impartiality, confidentiality, conflicts of interest, professional conduct, and duties to the court. As drafted, a broad range of allegations could lead to disciplinary letters, corrective actions, mandatory skills assessments, retesting requirements, and public disclosure before any formal adjudication has occurred. This raises significant due process concerns. Many California court interpreters are represented employees working under negotiated Memoranda of Understanding that include disciplinary procedures, representation rights, grievance processes, and due process protections. I am concerned that the proposed credential review process could be used to address matters that are already governed by existing disciplinary systems negotiated between the courts and employee organizations. The credential review process should not become an alternative disciplinary pathway that bypasses negotiated disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. If these procedures affect represented employees, the Judicial Council and the courts should ensure compliance with all applicable meet-and-confer obligations and fully respect negotiated labor protections. I hope the judicial council remove the provision authorizing public posting of disciplinary letters that have not been adjudicated through a formal hearing process; establish clear, objective, validated, and transparent standards for skills assessments; provide meaningful appeal rights and independent review of assessment results; clarify how courtroom and environmental conditions will be considered when evaluating interpreter performance; ensure that credential review procedures do not circumvent negotiated disciplinary procedures, union representation rights,	determines that an assessment is necessary to evaluate a legitimate concern regarding interpreting skills. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. No skills assessment or disciplinary action would be imposed without supporting evidence. Once an assessment is appropriately required, participation is necessary for the Judicial Council to determine whether further action, remediation, or no action is warranted. The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. Credential review and trial court employment discipline serve distinct, though sometimes related, purposes. Trial courts remain responsible for addressing employment matters,

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			grievance procedures, or other protections contained in collective bargaining agreements; preserve full due process protections before disciplinary actions become public; include representatives of the California Federation of Interpreters and other interpreter stakeholders in the development, implementation, oversight, and ongoing review of the skills assessment and credential review process. Court interpreters play a vital role in ensuring meaningful access to justice and full participation in judicial proceedings. Any system established to evaluate interpreter competence or impose discipline should be fair, transparent, objective, and respectful of both professional standards and constitutional due process. For these reasons, I respectfully urge the Judicial Council to revise SP26-04 before adopting the proposed amendments.	including any applicable collective bargaining, representation, grievance, and due process requirements. These actions are focused on an interpreter's employment with the trial court. In contrast, the Judicial Council's credential review process is focused specifically on an interpreter's statewide credential and its responsibility to maintain the integrity of that credential. While the same conduct may give rise to both employment-related and credentialing concerns, each process addresses a different interest and operates within its respective authority. The credential review process is not intended to replace, duplicate, or circumvent applicable employment processes or protections. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also

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				maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.
36.	Golrokh (Goli) Khatibloo Certified Farsi (Persian) Interpreter	AM	Greetings, I am writing to voice my concerns regarding the Credential Review Process against interpreters. I believe the following should take place: 1. When an interpreter misconduct is brought to the attention of the Judicial Council, the complainant should provide sufficient evidence in support of said complaint, not through mere words, just like an attorney who must prove his/her case. The interpreter should also receive a notice stating the summary and date of the allegations, as well as the case file number of the case interpreted; the interpreter should receive the evidence that supports the complaint. If sufficient evidence is not provided in the complaint a charging document should not be issued. 2. Credentialed interpreters of all languages should be subject to the disciplinary process, regardless of language. Considering that non-credentialed interpreters are regularly hired to perform interpreting services in court, despite California law credentialing requirements, they appear to be immune to any type of disciplinary process for misconduct, incompetence, or ethical violations. Credentialed interpreters have invested, and continue to invest, significant time, effort, and cost to maintain their credentials continuously, whereas non-credentialed interpreters do not bear the burden of such discipline. Not only does this create inequality and unfairness amongst all	The committee appreciates the concern regarding equitable application across all credentialed languages. The next draft will clarify that the same substantive threshold and procedural protections apply regardless of language and that the Judicial Council will make every effort to create a skills assessment process in every certified language as some are currently in development. The Credential Review Procedures apply specifically to California certified and registered court interpreters who hold a Judicial Council-issued credential and are included on the Judicial Council Master List. Accordingly, these procedures are intended to address matters that may affect an interpreter's credential and continued eligibility to maintain that credential. Oversight of non-credentialed or provisionally qualified interpreters

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			interpreters, but it also undermines the value of credentialing. Non-credentialed interpreters have no fear of discipline and perform at subpar levels. I hope the Judicial Council hears the voice of the credentialed interpreters, asking for all interpreters, whether credentialed or not, to face disciplinary action equally without any exclusion.	falls outside the scope of the Credential Review Procedures and is governed by other applicable trial court policies, Judicial Council program requirements, and related standards or procedures.
37.	Karen Klebingat California Certified Court Interpreter for Spanish; Los Angeles	AM	To the Judicial Council and Court Interpreters Advisory Panel: I, Karen Klebingat am a California court interpreter and respectfully submit the following comments regarding SP26-04, Proposed Revisions to the California Court Interpreter Credential Review Procedures. I support maintaining high professional standards for court interpreters and believe that the public deserves qualified, ethical, and competent language access services. However, I have serious concerns regarding several aspects of the proposed changes. Public Disciplinary Letters Without Formal Due Process: The proposal authorizes the Court Interpreters Program (CIP) to issue disciplinary letters and publicly post the subject and terms of those letters on an interpreter's Master List record. This is concerning because a disciplinary letter could become part of an interpreter's permanent public professional record without a hearing before the Office of Administrative Hearings, without findings by an Administrative Law Judge, and without the procedural protections traditionally associated with formal discipline. A public disciplinary posting can affect an interpreter's professional reputation, future employment opportunities, and standing within the profession. Such consequences should not occur without full due process protections and independent review. Unclear Standards for Skills Assessments: The proposal creates a mandatory skills assessment process but does not clearly identify the standards by which interpreters will be evaluated. California's credentialing system already establishes the qualifications necessary to become a certified or registered court interpreter. The proposal appears to create a new layer of evaluation without clearly identifying the performance standard, scoring criteria, appeal rights,	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2)

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			evaluator accountability, or protections against subjective judgments. Court interpretation is a highly complex profession performed in real time under constantly changing conditions. Unlike a controlled testing environment, interpreters routinely work through background noise, overlapping speakers, poor acoustics, low-volume speakers, rapid speech, trailing words, incomplete sentences, regional accents, emotional testimony, legal terminology, terms of art, and unexpected subject matter. Judges, attorneys, witnesses, and litigants often speak at speeds significantly faster than normal conversational speech. Interpreters frequently raise concerns regarding these communication barriers and environmental impediments, yet those concerns are not always addressed before interpretation continues. Even highly skilled interpreters may occasionally encounter unfamiliar terminology, momentary word-retrieval difficulties, or difficult speech patterns. These realities are inherent in court interpretation and do not necessarily indicate incompetence. The proposal does not adequately explain how evaluators will distinguish between genuine deficiencies in an interpreter's knowledge, skills, and abilities and isolated performance issues caused by difficult courtroom conditions. Mandatory Participation and Potential Discipline: The proposal states that participation in the skills assessment process is mandatory and that failure to participate may lead to suspension and possible revocation proceedings. I am concerned that an interpreter could face disciplinary consequences based on a dispute regarding participation in the assessment process itself rather than proven misconduct or incompetence. Before such authority is granted, the Judicial Council should establish clear standards, appeal rights, review procedures, and safeguards to ensure fairness and consistency. Broad Expansion of Rule 2.890 Allegations: The proposal also expands the potential use of allegations under California Rule of Court 2.890. Rule 2.890 covers broad areas of professional conduct including accuracy, impartiality,	request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During

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			confidentiality, conflicts of interest, professional demeanor, and duties to the court. As written, a wide range of alleged conduct could potentially result in disciplinary letters, corrective actions, skills assessments, retesting requirements, and public disclosure before formal adjudication has occurred. Impact on Represented Employee Interpreters: Many court interpreters are represented employees working under negotiated Memoranda of Understanding that contain disciplinary procedures, representation rights, grievance procedures, and due process protections. I am concerned that the proposed credential review process could be used to address issues that are already covered by existing disciplinary systems negotiated between courts and employee organizations. Credential review should not become an alternative pathway that bypasses established disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. If implementation of these procedures affects represented employees, the Judicial Council and courts should ensure that applicable meet-and-confer obligations are satisfied and that negotiated labor protections are respected. Requested Revisions: I respectfully request that the Judicial Council: 1. Remove the provision authorizing public posting of disciplinary letters that have not been adjudicated through a formal hearing process. 2. Establish clear, objective, validated, and transparent standards for skills assessments. 3. Provide meaningful appeal rights and independent review of assessment results. 4. Clarify how environmental and courtroom conditions will be considered when evaluating interpreter performance. 5. Ensure that credential review procedures do not circumvent negotiated disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. 6. Preserve full due process protections before disciplinary actions become public. 7. Include Union Representation in the	development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). A skills assessment would not be required merely because a complaint is filed. It would be required only when the credential review process determines that an assessment is necessary to evaluate a legitimate concern regarding interpreting skills. The credential review process

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			Development and Oversight Process. The Judicial Council should include representatives of the California Federation of Interpreters and other interpreter stakeholders in the development, implementation, and ongoing review of the skills assessment and credential review process. Conclusion: Court interpreters play a critical role in protecting access to justice and meaningful participation in judicial proceedings. Any system designed to evaluate interpreter competence or impose discipline should be fair, transparent, objective, and respectful of both professional standards and due process rights. I respectfully urge the Judicial Council to revise SP26-04 before adoption. Thank you for your consideration.	provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. No skills assessment or disciplinary action would be imposed without supporting evidence. Once an assessment is appropriately required, participation is necessary for the Judicial Council to determine whether further action, remediation, or no action is warranted. The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. Credential review and trial court employment discipline serve distinct, though sometimes related, purposes. Trial courts remain responsible for addressing employment matters, including any applicable collective bargaining, representation, grievance, and due process requirements. These actions are focused on an interpreter's

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				employment with the trial court. In contrast, the Judicial Council's credential review process is focused specifically on an interpreter's statewide credential and its responsibility to maintain the integrity of that credential. While the same conduct may give rise to both employment-related and credentialing concerns, each process addresses a different interest and operates within its respective authority. The credential review process is not intended to replace, duplicate, or circumvent applicable employment processes or protections. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and

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				proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.
38.	Legal Aid Association of California (LAAC) by Zachary Newman, Directing Attorney	AM	Dear Members of the Court Interpreters Advisory Panel: The Legal Aid Association of California (LAAC) appreciates the opportunity to comment on SP26-04 regarding proposed revisions to the California Court Interpreter Credential Review Procedures (SP26-04). LAAC supports the Judicial Council's efforts to strengthen interpreter quality, accountability, and consistency through the development of a standardized skills assessment process. Meaningful language access is essential to ensuring equal access to justice for Californians with limited English proficiency, and interpreter competency is a critical component of that goal. We therefore generally support the proposal's incorporation of a structured assessment process and the creation of intermediate corrective measures that may allow concerns to be addressed before formal disciplinary proceedings become necessary. Overall, LAAC supports efforts to improve and streamline the court interpreter credential review process in a manner that promotes meaningful language access for Californians with limited English proficiency. This is, above all, the most important part, for us: Increasing access to trained and effective court interpreters for legal aid clients and self-represented litigants. Within this, we appreciate the Judicial Council's focus on creating a more standardized and transparent approach to evaluating interpreter performance and resolving complaints levied against them. To the extent possible, we encourage continued efforts to simplify procedures, promote consistency in outcomes, and support the development and	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is

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			retention of a qualified interpreter workforce across California's diverse languages. Clear, efficient, and accessible processes benefit interpreters, courts, and court users alike and help advance equal access to justice. Specifically in this proposal, we appreciate the proposal's emphasis on using trained evaluators, standardized assessment tools, and objective criteria to evaluate interpreter performance. These changes have the potential to improve consistency in the handling of complaints while helping identify training and professional development opportunities that support interpreter effectiveness and, ultimately, court users' access to justice. LAAC also encourages the Judicial Council to ensure that interpreters have clear procedural protections throughout the assessment and disciplinary process, including transparent standards for when skills assessments are required, how results are evaluated, and when disciplinary letters may be issued. At the same time, LAAC supports the proposal's efforts to streamline and clarify the credential review process, so long as those efficiencies continue to promote access and do not create barriers for legal aid and other litigants in accessing interpreters. Because disciplinary letters function as corrective or intermediate steps rather than final disciplinary determinations, the standards governing their use should be clearly defined, with appropriate notice and an opportunity to respond, and any public disclosure should generally be limited to final disciplinary decisions and sanctions. Finally, as resources permit, LAAC encourages the continued expansion of assessment capacity beyond Spanish to support equitable access for interpreters in languages of lesser diffusion and to strengthen language access across California's courts. Thank you for considering these comments and for your continued efforts to improve language access and interpreter quality in California's judicial system.	subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed

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				by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of

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				proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections.

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				The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined. The committee appreciates the concern regarding equitable application across all credentialed languages. The next draft will clarify that the same substantive threshold and procedural protections apply regardless of language and that the Judicial Council will make every effort to create a skills assessment process in every certified language as some are currently in development.
39.	Rosa Isela Lopez California Certified Court Interpreter, Spanish/English; Merced	AM	To the Judicial council and Court Interpreters Advisory Panel: As a California court interpreter, I respectfully submit the following comments regarding SP26-04, Proposed Revisions to the California Court Interpreter Credential Review Procedures. I support maintaining high professional standards for court interpreters and know that the public should expect qualified, competent and ethical language access services. I do, however have serious concerns about several aspects of the proposed changes. Public Disciplinary Letter Without Formal Due Process This authorizes the court Interpreters Program (CIP) to issue disciplinary letters and to publicly post the subject and terms on an Interpreter's Master List record. A disciplinary letter thus could become part of an interpreter's permanent public record without a hearing before the Office of Administrative Hearings, without findings by an Administrative Law Judge, and without the procedural protections traditionally associated with formal discipline. A public disciplinary posting can affect an interpreter's professional reputation, future employment opportunities, and standing within the profession. Such	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also

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			consequences must not occur without full due process protections and independent review. Unclear Standards for Skills Assessments The proposal creates a mandatory skills assessment process and does not clearly identify the standards by which interpreters would be evaluated. California's credentialing system has already established the rigorous qualifications necessary to become a certified or registered court interpreter. The proposal seems to add a new layer of evaluation without clearly identifying the performance standard, scoring criteria, appeal rights, evaluator accountability, or protections against subjective judgements. Court interpretation is a highly complex profession performed in real time under constantly changing conditions. Unlike a controlled testing environment, interpreters routinely work through background noise, overlapping speakers, poor acoustics, low volume speakers, rapid speech, trailing words, incomplete sentences, emotional testimony, legal terminology, terms of art, and unexpected subject matter. Judges, attorneys, witnesses, and litigants often speak at speeds significantly faster than normal conversational speech. Interpreters frequently raise concerns regarding these communication barriers and environmental impediments, yet the concerns are not always addressed before interpretation continues. Even highly skilled interpreters may occasionally encounter unfamiliar terminology, momentary word retrieval difficulties, or difficult speech patterns. These realities are inherent in court interpretation and do not indicate incompetence. The proposal does not adequately explain how evaluators will distinguish between true deficiencies in an interpreter's knowledge, skills, and abilities and isolated performance issues caused by difficult courtroom conditions. Mandatory Participation and Potential Discipline The proposal states that participation in the skills assessment process is mandatory and that failure to participate may lead to suspension and possible revocation proceedings. I am concerned that an interpreter could face disciplinary	provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of

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			consequences based on a dispute regarding participation in the assessment process itself rather than proven misconduct or incompetence. Before such authority is granted, the Judicial Council should establish clear standards, appeal rights, review procedures and safeguards to ensure fairness and consistency. Broad Expansion of Rule 2.890 allegations The proposal also expands the potential use of allegations under California Rule of court 2.890. Rule 2.890 covers broad areas of professional conduct including accuracy, impartiality confidentiality, conflicts of interest, professional demeanor, and duties of the court. As written, a wide range of alleged conduct could potentially result in disciplinary letters, corrective actions, skills assessments, retesting requirements, and public disclosure before formal adjudication has occurred. Impact on Represented Employee Interpreters Many court interpreters are represented employees working under negotiated Memoranda od Understanding that contain disciplinary procedures, representation rights, grievance procedures, and other protections contained in collective bargaining agreements. If implementation of these procedures affects represented employees, the Judicial Council and courts should ensure that applicable meet-and-confer obligations are satisfied and that negotiated labor protections will be respected. Requested Revisions I respectfully request that the Judicial council: 1. Remove the provision authorizing public posting of disciplinary letters that have not been adjudicated through a formal hearing process. 2. Establish clear, objective, validated and transparent standards for skills assessments. 3. Provide meaningful appeal rights and independent review of assessment results. 4. Clarify how environmental and courtroom conditions will be considered when evaluating interpreter performance. 5. Ensure that credential review procedures do not circumvent negotiated disciplinary procedures, or other protections contained in collective bargaining agreements. 6. Preserve full due process protections before disciplinary actions become public. Include Union Representation in the	diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or

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			Development and Oversight Process. The Judicial council should include representatives of the California Federation of Interpreters and other interpreter stakeholders in the development, implementation, and ongoing review of the skills assessment and credential review process. Conclusion Court interpreters exercise a critical role in protecting access to justice and meaningful participation in judicial proceedings. Any system designed to evaluate interpreter competence or impose discipline must be fair, transparent objective and respectful of both professional standards and due process rights. Respectfully, I urge the Judicial Council to revise SP26-04 before adoption. Thank you for your consideration.	referral to the Office of Administrative Hearings (OAH). A skills assessment would not be required merely because a complaint is filed. It would be required only when the credential review process determines that an assessment is necessary to evaluate a legitimate concern regarding interpreting skills. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. No skills assessment or disciplinary action would be imposed without supporting evidence. Once an assessment is appropriately required, participation is necessary for the Judicial Council to determine whether further action, remediation, or no action is warranted. The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an

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				opportunity to respond before a determination is made. Credential review and trial court employment discipline serve distinct, though sometimes related, purposes. Trial courts remain responsible for addressing employment matters, including any applicable collective bargaining, representation, grievance, and due process requirements. These actions are focused on an interpreter's employment with the trial court. In contrast, the Judicial Council's credential review process is focused specifically on an interpreter's statewide credential and its responsibility to maintain the integrity of that credential. While the same conduct may give rise to both employment-related and credentialing concerns, each process addresses a different interest and operates within its respective authority. The credential review process is not intended to replace, duplicate, or circumvent applicable employment processes or protections. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the

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				Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.
40.	Susie Luna California Certified/Registered Court Interpreter, English/Spanish; Victorville	AM	To the Judicial Council and Court Interpreters Advisory Panel: I am a California court interpreter and respectfully submit the following comments regarding SP26-04, Proposed Revisions to the California Court Interpreter Credential Review Procedures. I support maintaining high professional standards for court interpreters and believe that the public deserves qualified, ethical, and competent language access services. However, I have serious concerns regarding several aspects of the proposed changes. Public Disciplinary Letters Without Formal Due Process: The proposal authorizes the Court Interpreters Program (CIP) to issue disciplinary letters and publicly post the subject and terms of those letters on an interpreter's Master List record. This is concerning because a disciplinary letter could become part of an interpreter's permanent public professional record without a hearing before the Office of Administrative Hearings, without	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct.

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			findings by an Administrative Law Judge, and without the procedural protections traditionally associated with formal discipline. A public disciplinary posting can affect an interpreter's professional reputation, future employment opportunities, and standing within the profession. Such consequences should not occur without full due process protections and independent review. Unclear Standards for Skills Assessments: The proposal creates a mandatory skills assessment process but does not clearly identify the standards by which interpreters will be evaluated. California's credentialing system already establishes the qualifications necessary to become a certified or registered court interpreter. The proposal appears to create a new layer of evaluation without clearly identifying the performance standard, scoring criteria, appeal rights, evaluator accountability, or protections against subjective judgments. Court interpretation is a highly complex profession performed in real time under constantly changing conditions. Unlike a controlled testing environment, interpreters routinely work through background noise, overlapping speakers, poor acoustics, low-volume speakers, rapid speech, trailing words, incomplete sentences, regional accents, emotional testimony, legal terminology, terms of art, and unexpected subject matter. Judges, attorneys, witnesses, and litigants often speak at speeds significantly faster than normal conversational speech. Interpreters frequently raise concerns regarding these communication barriers and environmental impediments, yet those concerns are not always addressed before interpretation continues. Even highly skilled interpreters may occasionally encounter unfamiliar terminology, momentary word-retrieval difficulties, or difficult speech patterns. These realities are inherent in court interpretation and do not necessarily indicate incompetence. The proposal does not adequately explain how evaluators will distinguish between genuine deficiencies in an interpreter's knowledge, skills, and abilities and isolated performance issues caused by difficult	A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech,

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			courtroom conditions. Mandatory Participation and Potential Discipline: The proposal states that participation in the skills assessment process is mandatory and that failure to participate may lead to suspension and possible revocation proceedings. I am concerned that an interpreter could face disciplinary consequences based on a dispute regarding participation in the assessment process itself rather than proven misconduct or incompetence. Before such authority is granted, the Judicial Council should establish clear standards, appeal rights, review procedures, and safeguards to ensure fairness and consistency. Broad Expansion of Rule 2.890 Allegations: The proposal also expands the potential use of allegations under California Rule of Court 2.890. Rule 2.890 covers broad areas of professional conduct including accuracy, impartiality, confidentiality, conflicts of interest, professional demeanor, and duties to the court. As written, a wide range of alleged conduct could potentially result in disciplinary letters, corrective actions, skills assessments, retesting requirements, and public disclosure before formal adjudication has occurred. Impact on Represented Employee Interpreters: Many court interpreters are represented employees working under negotiated Memoranda of Understanding that contain disciplinary procedures, representation rights, grievance procedures, and due process protections. I am concerned that the proposed credential review process could be used to address issues that are already covered by existing disciplinary systems negotiated between courts and employee organizations. Credential review should not become an alternative pathway that bypasses established disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. If implementation of these procedures affects represented employees, the Judicial Council and courts should ensure that applicable meet-and-confer obligations are satisfied and that negotiated labor protections are respected. Requested	poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine

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			Revisions: I respectfully request that the Judicial Council: 1. Remove the provision authorizing public posting of disciplinary letters that have not been adjudicated through a formal hearing process. 2. Establish clear, objective, validated, and transparent standards for skills assessments. 3. Provide meaningful appeal rights and independent review of assessment results. 4. Clarify how environmental and courtroom conditions will be considered when evaluating interpreter performance. 5. Ensure that credential review procedures do not circumvent negotiated disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. 6. Preserve full due process protections before disciplinary actions become public. 7. Include Union Representation in the Development and Oversight Process. The Judicial Council should include representatives of the California Federation of Interpreters and other interpreter stakeholders in the development, implementation, and ongoing review of the skills assessment and credential review process. Conclusion: Court interpreters play a critical role in protecting access to justice and meaningful participation in judicial proceedings. Any system designed to evaluate interpreter competence or impose discipline should be fair, transparent, objective, and respectful of both professional standards and due process rights. I respectfully urge the Judicial Council to revise SP26-04 before adoption. Thank you for your consideration.	whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). A skills assessment would not be required merely because a complaint is filed. It would be required only when the credential review process determines that an assessment is necessary to evaluate a legitimate concern regarding interpreting skills. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. No skills assessment or disciplinary action would be imposed without supporting evidence. Once an assessment is appropriately required, participation is necessary for the Judicial Council to determine whether further action, remediation, or no action is warranted. The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone

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				does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. Credential review and trial court employment discipline serve distinct, though sometimes related, purposes. Trial courts remain responsible for addressing employment matters, including any applicable collective bargaining, representation, grievance, and due process requirements. These actions are focused on an interpreter's employment with the trial court. In contrast, the Judicial Council's credential review process is focused specifically on an interpreter's statewide credential and its responsibility to maintain the integrity of that credential. While the same conduct may give rise to both employment-related and credentialing concerns, each process addresses a different interest and operates within its respective authority. The credential review process is not intended to replace, duplicate, or circumvent applicable employment processes or protections. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment

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				standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.
41.	Omayra Martinez California Certified/Registered Court Interpreter, Spanish; Riverside	AM	To the Judicial Council and Court Interpreters Advisory Panel: I am a California court interpreter and respectfully submit the following comments regarding SP26-04, Proposed Revisions to the California Court Interpreter Credential Review Procedures. I support maintaining high professional standards for court interpreters and believe that the public deserves qualified, ethical, and competent language access services. However, I have serious concerns regarding several aspects of the proposed changes. Public Disciplinary Letters Without Formal Due Process: The proposal authorizes the Court Interpreters	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate

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			Program (CIP) to issue disciplinary letters and publicly post the subject and terms of those letters on an interpreter's Master List record. This is concerning because a disciplinary letter could become part of an interpreter's permanent public professional record without a hearing before the Office of Administrative Hearings, without findings by an Administrative Law Judge, and without the procedural protections traditionally associated with formal discipline. A public disciplinary posting can affect an interpreter's professional reputation, future employment opportunities, and standing within the profession. Such consequences should not occur without full due process protections and independent review. Unclear Standards for Skills Assessments: The proposal creates a mandatory skills assessment process but does not clearly identify the standards by which interpreters will be evaluated. California's credentialing system already establishes the qualifications necessary to become a certified or registered court interpreter. The proposal appears to create a new layer of evaluation without clearly identifying the performance standard, scoring criteria, appeal rights, evaluator accountability, or protections against subjective judgments. Court interpretation is a highly complex profession performed in real time under constantly changing conditions. Unlike a controlled testing environment, interpreters routinely work through background noise, overlapping speakers, poor acoustics, low-volume speakers, rapid speech, trailing words, incomplete sentences, regional accents, emotional testimony, legal terminology, terms of art, and unexpected subject matter. Judges, attorneys, witnesses, and litigants often speak at speeds significantly faster than normal conversational speech. Interpreters frequently raise concerns regarding these communication barriers and environmental impediments, yet those concerns are not always addressed before interpretation continues. Even highly skilled interpreters may occasionally encounter unfamiliar terminology, momentary word-retrieval	when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish

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			difficulties, or difficult speech patterns. These realities are inherent in court interpretation and do not necessarily indicate incompetence. The proposal does not adequately explain how evaluators will distinguish between genuine deficiencies in an interpreter's knowledge, skills, and abilities and isolated performance issues caused by difficult courtroom conditions. Mandatory Participation and Potential Discipline: The proposal states that participation in the skills assessment process is mandatory and that failure to participate may lead to suspension and possible revocation proceedings. I am concerned that an interpreter could face disciplinary consequences based on a dispute regarding participation in the assessment process itself rather than proven misconduct or incompetence. Before such authority is granted, the Judicial Council should establish clear standards, appeal rights, review procedures, and safeguards to ensure fairness and consistency. Broad Expansion of Rule 2.890 Allegations: The proposal also expands the potential use of allegations under California Rule of Court 2.890. Rule 2.890 covers broad areas of professional conduct including accuracy, impartiality, confidentiality, conflicts of interest, professional demeanor, and duties to the court. As written, a wide range of alleged conduct could potentially result in disciplinary letters, corrective actions, skills assessments, retesting requirements, and public disclosure before formal adjudication has occurred. Impact on Represented Employee Interpreters: Many court interpreters are represented employees working under negotiated Memoranda of Understanding that contain disciplinary procedures, representation rights, grievance procedures, and due process protections. I am concerned that the proposed credential review process could be used to address issues that are already covered by existing disciplinary systems negotiated between courts and employee organizations. Credential review should not become an alternative pathway that bypasses established disciplinary procedures, union representation rights,	genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and

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			grievance procedures, or other protections contained in collective bargaining agreements. If implementation of these procedures affects represented employees, the Judicial Council and courts should ensure that applicable meet-and-confer obligations are satisfied and that negotiated labor protections are respected. Requested Revisions: I respectfully request that the Judicial Council: 1. Remove the provision authorizing public posting of disciplinary letters that have not been adjudicated through a formal hearing process. 2. Establish clear, objective, validated, and transparent standards for skills assessments. 3. Provide meaningful appeal rights and independent review of assessment results. 4. Clarify how environmental and courtroom conditions will be considered when evaluating interpreter performance. 5. Ensure that credential review procedures do not circumvent negotiated disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. 6. Preserve full due process protections before disciplinary actions become public. 7. Include Union Representation in the Development and Oversight Process. The Judicial Council should include representatives of the California Federation of Interpreters and other interpreter stakeholders in the development, implementation, and ongoing review of the skills assessment and credential review process. Conclusion: Court interpreters play a critical role in protecting access to justice and meaningful participation in judicial proceedings. Any system designed to evaluate interpreter competence or impose discipline should be fair, transparent, objective, and respectful of both professional standards and due process rights. I respectfully urge the Judicial Council to revise SP26-04 before adoption. Thank you for your consideration.	areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). A skills assessment would not be required merely because a complaint is filed. It would be required only when the credential review process determines that an assessment is necessary to evaluate a legitimate concern regarding interpreting skills. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. No skills assessment or disciplinary action would be imposed without supporting evidence. Once an assessment is appropriately required, participation is necessary for the Judicial Council to determine whether further action, remediation, or no action is warranted. The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of

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				proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. Credential review and trial court employment discipline serve distinct, though sometimes related, purposes. Trial courts remain responsible for addressing employment matters, including any applicable collective bargaining, representation, grievance, and due process requirements. These actions are focused on an interpreter's employment with the trial court. In contrast, the Judicial Council's credential review process is focused specifically on an interpreter's statewide credential and its responsibility to maintain the integrity of that credential. While the same conduct may give rise to both employment-related and credentialing concerns, each process addresses a different interest and operates within its respective authority. The credential review process is not intended to replace, duplicate, or circumvent applicable employment processes or protections.

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				The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.
42.	Concepcion Mendez California court interpreter	AM	To the Judicial Council and Court Interpreters Advisory Panel: I am a California court interpreter and respectfully submit the following comments regarding SP26-04, Proposed Revisions to the California Court Interpreter Credential Review Procedures. I support maintaining high professional standards for court interpreters and believe that the public deserves qualified, ethical, and competent language access services. However, I have serious	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do

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			concerns regarding several aspects of the proposed changes. Public Disciplinary Letters Without Formal Due Process: The proposal authorizes the Court Interpreters Program (CIP) to issue disciplinary letters and publicly post the subject and terms of those letters on an interpreter's Master List record. This is concerning because a disciplinary letter could become part of an interpreter's permanent public professional record without a hearing before the Office of Administrative Hearings, without findings by an Administrative Law Judge, and without the procedural protections traditionally associated with formal discipline. A public disciplinary posting can affect an interpreter's professional reputation, future employment opportunities, and standing within the profession. Such consequences should not occur without full due process protections and independent review. Unclear Standards for Skills Assessments: The proposal creates a mandatory skills assessment process but does not clearly identify the standards by which interpreters will be evaluated. California's credentialing system already establishes the qualifications necessary to become a certified or registered court interpreter. The proposal appears to create a new layer of evaluation without clearly identifying the performance standard, scoring criteria, appeal rights, evaluator accountability, or protections against subjective judgments. Court interpretation is a highly complex profession performed in real time under constantly changing conditions. Unlike a controlled testing environment, interpreters routinely work through background noise, overlapping speakers, poor acoustics, low-volume speakers, rapid speech, trailing words, incomplete sentences, regional accents, emotional testimony, legal terminology, terms of art, and unexpected subject matter. Judges, attorneys, witnesses, and litigants often speak at speeds significantly faster than normal conversational speech. Interpreters frequently raise concerns regarding these communication barriers and environmental impediments, yet those concerns are not	not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when

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			always addressed before interpretation continues. Even highly skilled interpreters may occasionally encounter unfamiliar terminology, momentary word-retrieval difficulties, or difficult speech patterns. These realities are inherent in court interpretation and do not necessarily indicate incompetence. The proposal does not adequately explain how evaluators will distinguish between genuine deficiencies in an interpreter's knowledge, skills, and abilities and isolated performance issues caused by difficult courtroom conditions. Mandatory Participation and Potential Discipline: The proposal states that participation in the skills assessment process is mandatory and that failure to participate may lead to suspension and possible revocation proceedings. I am concerned that an interpreter could face disciplinary consequences based on a dispute regarding participation in the assessment process itself rather than proven misconduct or incompetence. Before such authority is granted, the Judicial Council should establish clear standards, appeal rights, review procedures, and safeguards to ensure fairness and consistency. Broad Expansion of Rule 2.890 Allegations: The proposal also expands the potential use of allegations under California Rule of Court 2.890. Rule 2.890 covers broad areas of professional conduct including accuracy, impartiality, confidentiality, conflicts of interest, professional demeanor, and duties to the court. As written, a wide range of alleged conduct could potentially result in disciplinary letters, corrective actions, skills assessments, retesting requirements, and public disclosure before formal adjudication has occurred. Impact on Represented Employee Interpreters: Many court interpreters are represented employees working under negotiated Memoranda of Understanding that contain disciplinary procedures, representation rights, grievance procedures, and due process protections. I am concerned that the proposed credential review process could be used to address issues that are already covered by existing disciplinary systems negotiated between courts and	a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two

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			employee organizations. Credential review should not become an alternative pathway that bypasses established disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. If implementation of these procedures affects represented employees, the Judicial Council and courts should ensure that applicable meet-and-confer obligations are satisfied and that negotiated labor protections are respected. Requested Revisions: I respectfully request that the Judicial Council: 1. Remove the provision authorizing public posting of disciplinary letters that have not been adjudicated through a formal hearing process. 2. Establish clear, objective, validated, and transparent standards for skills assessments. 3. Provide meaningful appeal rights and independent review of assessment results. 4. Clarify how environmental and courtroom conditions will be considered when evaluating interpreter performance. 5. Ensure that credential review procedures do not circumvent negotiated disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. 6. Preserve full due process protections before disciplinary actions become public. 7. Include Union Representation in the Development and Oversight Process. The Judicial Council should include representatives of the California Federation of Interpreters and other interpreter stakeholders in the development, implementation, and ongoing review of the skills assessment and credential review process. Conclusion: Court interpreters play a critical role in protecting access to justice and meaningful participation in judicial proceedings. Any system designed to evaluate interpreter competence or impose discipline should be fair, transparent, objective, and respectful of both professional standards and due process rights. I respectfully urge the Judicial Council to revise SP26-04 before adoption. Thank you for your consideration.	evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). A skills assessment would not be required merely because a complaint is filed. It would be required only when the credential review process determines that an assessment is necessary to evaluate a legitimate concern regarding interpreting skills. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. No skills assessment or disciplinary action would be imposed without supporting evidence. Once an assessment is appropriately required, participation is necessary for the Judicial Council to determine whether further action, remediation, or no action is warranted. The proposal does not expand the substantive professional standards

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				contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. Credential review and trial court employment discipline serve distinct, though sometimes related, purposes. Trial courts remain responsible for addressing employment matters, including any applicable collective bargaining, representation, grievance, and due process requirements. These actions are focused on an interpreter's employment with the trial court. In contrast, the Judicial Council's credential review process is focused specifically on an interpreter's statewide credential and its responsibility to maintain the integrity of that credential. While the same conduct may give rise to both employment-related and credentialing concerns, each process addresses a different interest and operates within its respective authority. The credential review process is not intended to replace, duplicate, or circumvent

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				applicable employment processes or protections. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.
43.	Mirella Michel California Certified/Registered Court Interpreter, Spanish; San Bernardino	AM	To the Judicial Council and Court Interpreters Advisory Panel: I am a California court interpreter and respectfully submit the following comments regarding SP26-04, Proposed Revisions to the California Court Interpreter Credential Review Procedures. I support maintaining high	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an

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			professional standards for court interpreters and believe that the public deserves qualified, ethical, and competent language access services. However, I have serious concerns regarding several aspects of the proposed changes. Public Disciplinary Letters Without Formal Due Process: The proposal authorizes the Court Interpreters Program (CIP) to issue disciplinary letters and publicly post the subject and terms of those letters on an interpreter's Master List record. This is concerning because a disciplinary letter could become part of an interpreter's permanent public professional record without a hearing before the Office of Administrative Hearings, without findings by an Administrative Law Judge, and without the procedural protections traditionally associated with formal discipline. A public disciplinary posting can affect an interpreter's professional reputation, future employment opportunities, and standing within the profession. Such consequences should not occur without full due process protections and independent review. Unclear Standards for Skills Assessments: The proposal creates a mandatory skills assessment process but does not clearly identify the standards by which interpreters will be evaluated. California's credentialing system already establishes the qualifications necessary to become a certified or registered court interpreter. The proposal appears to create a new layer of evaluation without clearly identifying the performance standard, scoring criteria, appeal rights, evaluator accountability, or protections against subjective judgments. Court interpretation is a highly complex profession performed in real time under constantly changing conditions. Unlike a controlled testing environment, interpreters routinely work through background noise, overlapping speakers, poor acoustics, low-volume speakers, rapid speech, trailing words, incomplete sentences, regional accents, emotional testimony, legal terminology, terms of art, and unexpected subject matter. Judges, attorneys, witnesses, and litigants often speak at speeds significantly faster than normal	intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification

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			conversational speech. Interpreters frequently raise concerns regarding these communication barriers and environmental impediments, yet those concerns are not always addressed before interpretation continues. Even highly skilled interpreters may occasionally encounter unfamiliar terminology, momentary word-retrieval difficulties, or difficult speech patterns. These realities are inherent in court interpretation and do not necessarily indicate incompetence. The proposal does not adequately explain how evaluators will distinguish between genuine deficiencies in an interpreter's knowledge, skills, and abilities and isolated performance issues caused by difficult courtroom conditions. Mandatory Participation and Potential Discipline: The proposal states that participation in the skills assessment process is mandatory and that failure to participate may lead to suspension and possible revocation proceedings. I am concerned that an interpreter could face disciplinary consequences based on a dispute regarding participation in the assessment process itself rather than proven misconduct or incompetence. Before such authority is granted, the Judicial Council should establish clear standards, appeal rights, review procedures, and safeguards to ensure fairness and consistency. Broad Expansion of Rule 2.890 Allegations: The proposal also expands the potential use of allegations under California Rule of Court 2.890. Rule 2.890 covers broad areas of professional conduct including accuracy, impartiality, confidentiality, conflicts of interest, professional demeanor, and duties to the court. As written, a wide range of alleged conduct could potentially result in disciplinary letters, corrective actions, skills assessments, retesting requirements, and public disclosure before formal adjudication has occurred. Impact on Represented Employee Interpreters: Many court interpreters are represented employees working under negotiated Memoranda of Understanding that contain disciplinary procedures, representation rights, grievance procedures, and due process protections. I am concerned that the	examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to

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			proposed credential review process could be used to address issues that are already covered by existing disciplinary systems negotiated between courts and employee organizations. Credential review should not become an alternative pathway that bypasses established disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. If implementation of these procedures affects represented employees, the Judicial Council and courts should ensure that applicable meet-and-confer obligations are satisfied and that negotiated labor protections are respected. Requested Revisions: I respectfully request that the Judicial Council: 1. Remove the provision authorizing public posting of disciplinary letters that have not been adjudicated through a formal hearing process. 2. Establish clear, objective, validated, and transparent standards for skills assessments. 3. Provide meaningful appeal rights and independent review of assessment results. 4. Clarify how environmental and courtroom conditions will be considered when evaluating interpreter performance. 5. Ensure that credential review procedures do not circumvent negotiated disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. 6. Preserve full due process protections before disciplinary actions become public. 7. Include Union Representation in the Development and Oversight Process. The Judicial Council should include representatives of the California Federation of Interpreters and other interpreter stakeholders in the development, implementation, and ongoing review of the skills assessment and credential review process. Conclusion: Court interpreters play a critical role in protecting access to justice and meaningful participation in judicial proceedings. Any system designed to evaluate interpreter competence or impose discipline should be fair, transparent, objective, and respectful of both professional standards and due process rights. I respectfully urge the	reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). A skills assessment would not be required merely because a complaint is filed. It would be required only when the credential review process determines that an assessment is necessary to evaluate a legitimate concern regarding interpreting skills. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. No skills assessment or disciplinary action would be imposed without supporting evidence. Once an assessment is appropriately required, participation is necessary for the Judicial Council to determine whether further action, remediation, or no action is warranted.

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			Judicial Council to revise SP26-04 before adoption. Thank you for your consideration.	The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. Credential review and trial court employment discipline serve distinct, though sometimes related, purposes. Trial courts remain responsible for addressing employment matters, including any applicable collective bargaining, representation, grievance, and due process requirements. These actions are focused on an interpreter's employment with the trial court. In contrast, the Judicial Council's credential review process is focused specifically on an interpreter's statewide credential and its responsibility to maintain the integrity of that credential. While the same conduct may give rise to both employment-related and credentialing concerns, each process addresses a different interest and operates within

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				its respective authority. The credential review process is not intended to replace, duplicate, or circumvent applicable employment processes or protections. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.

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44.	Brenda Oliver Certified Spanish court interpreter; San Mateo County	N	To the Court Interpreters Advisory Panel, I am a certified Spanish court interpreter in San Mateo County writing to express my strong opposition to SP26-04 as currently drafted. The proposal in its current form creates significant due process and fairness concerns and includes disproportionately severe disciplinary measures. It is essential that court interpreter feedback is taken into account and that the proposal undergoes extensive revision. My primary objections include the following: - Presumption of Guilt: The proposal treats a complaint as proof of misconduct before it has been properly substantiated. - Impromptu testing is arbitrary: Certification exams are very difficult to pass and interpreters take months to prepare for them moreover, the exams don't necessarily reflect the demands of daily court tasks, nor do they take into account the years of proven experience and expertise of court interpreters. - Public disciplinary letters punish the court interpreter before anything is proven: Posting a disciplinary letter on a public Master list entry before any hearing and before any allegations are established would inflict serious reputational and financial harm based on unproven claims. - This puts court interpreters livelihoods at risk: For employee court interpreters like myself, losing our credentials wouldn't just affect our reputation- it would end our employment and income. I remember one time when a Spanish speaking attorney challenged my interpretation, and I stood by my interpretation because I knew my interpretation was absolutely correct due to my intimate knowledge of the cultural meaning in the spoken dialect. If SB26-04 were in place at that time when I was challenged, and if that attorney would have filed a complaint against me, I would have suffered severe consequences. I urge the panel to reconsider these measures and revise the proposal to ensure a fair and equitable process.	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the

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				hearing and final resolution of the matter. The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the

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				statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.
45.	David Ordonez Certified Court Interpreter / Certified Healthcare Interpreter	AM	To the Court Interpreters Advisory Panel, I am a certified Spanish court interpreter in San Mateo County writing to express my strong opposition to SP26-04 as currently drafted. The proposal in its current form creates significant due process and fairness concerns and includes disproportionately severe disciplinary measures. It is essential that court interpreter feedback is taken into account and that the proposal undergoes extensive revision. My primary objections include the following: - Presumption of Guilt: The proposal treats a complaint as proof of misconduct before it has been properly substantiated. - Impromptu testing is arbitrary: Certification exams are very difficult to pass and interpreters take months to prepare for them moreover, the exams don't necessarily reflect the demands of daily court tasks, nor do they take into account the years of proven experience and expertise of court interpreters. - Public disciplinary letters punish the court interpreter before anything is proven: Posting a disciplinary letter on a public Master list entry before any hearing and before any allegations are established would inflict serious reputational and financial harm based on unproven claims. - This puts court interpreters livelihoods at risk: For employee court interpreters like myself, losing our credentials wouldn't just affect our reputation- it would end our employment and income. I remember one time	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made.

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			when a Spanish speaking attorney challenged my interpretation, and I stood by my interpretation because I knew my interpretation was absolutely correct due to my intimate knowledge of the cultural meaning in the spoken dialect. If SB26-04 were in place at that time when I was challenged, and if that attorney would have filed a complaint against me, I would have suffered severe consequences. I urge the panel to reconsider these measures and revise the proposal to ensure a fair and equitable process.	However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises

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				concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH).

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				The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and

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				proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.
46.	Angelica Ortiz-Cichocki Federally Certified / California Certified Spanish Court Interpreter; Circular Language Services	AM	Dear Members of the Court Interpreters Advisory Panel: I write as a Federally certified and California certified court interpreter to comment regarding the proposed amendments to the Credential Review Procedures under SP26-04. While I support the stated goals of greater consistency, objectivity, and proportionality in resolving complaints, the proposal as drafted falls short of that goal in several respects, and I ask the Panel to reconsider it before adoption. My central concern is that the proposed process is not sufficiently fair and transparent towards the interpreters it governs. A misconduct complaint may proceed through review without any supporting evidence at all, the current draft only invites documentation "if known or available," rather than requiring it. Once a complaint clears that low bar, the interpreter receives notice of the allegations but not the evidence behind them, leaving little real opportunity to respond before the matter advances. And when an investigation does turn up insufficient evidence, the procedures offer no clear way to say so: the listed paths to resolution assume some corrective outcome, withdrawal, surrender, settlement, or a disciplinary letter, with no option to simply close a matter that shouldn't have gone anywhere. Taken together, these gaps tilt the process toward finding fault rather than fairly testing whether fault exists, and I urge the Panel to build in a real evidentiary threshold at intake, provide interpreters the evidence against them at the notice stage, and add explicit closure for cases the evidence doesn't support. I'm also concerned about how unevenly the new competence-review tools will	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is

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			actually apply. The disciplinary and skills-assessment framework is written to cover every credentialed language, but the assessment itself will launch for Spanish only, with other languages added on an unspecified timeline. That means interpreters facing identical allegations will be evaluated very differently depending on the language they work in. Some with the benefit of a validated, third-party tool, others without it. The Panel should either hold off on competence-based discipline in languages where no assessment yet exists or move to make the tool available across the board before relying on it as grounds for sanction. Finally, I'd note a broader structural gap this proposal doesn't touch: individuals who interpret in California courts without ever obtaining a credential remain entirely outside any of this oversight, while credentialed interpreters –who sit for exams, meet continuing education requirements, and pay renewal fees year after year– face an expanding set of review and disclosure obligations. That asymmetry works against the credential itself, discouraging interpreters from pursuing or keeping one. I'd encourage the Judicial Council to take up, alongside this proposal, some parallel mechanism for holding non-credentialed interpreters to a comparable standard. I appreciate the Panel's work on this proposal and share its underlying goals. I hope these concerns are useful as the procedures are finalized, and I'd welcome the opportunity to discuss them further. Thank you for your consideration.	subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address

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				substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined. The committee appreciates the concern regarding equitable application across all credentialed languages. The next draft will clarify that the same substantive threshold and procedural protections apply regardless of language and that the Judicial Council will make every effort to create a skills assessment process in every certified language as some are currently in development. The Credential Review Procedures apply specifically to California certified and registered court interpreters who hold a Judicial Council-issued credential and are

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				included on the Judicial Council Master List. Accordingly, these procedures are intended to address matters that may affect an interpreter's credential and continued eligibility to maintain that credential. Oversight of non-credentialed or provisionally qualified interpreters falls outside the scope of the Credential Review Procedures and is governed by other applicable trial court policies, Judicial Council program requirements, and related standards or procedures.
47.	Maria Palacio California Administrative Hearing interpreter since 1993	AM	As an Administrative Hearing interpreter, I have completed professional training and continuous education over the years as I believe all interpreters should. I am not courtcertified however I believe that my experience and good work speaks for itself. It is unfair to non-English speakers that non-certified, uncredentialed interpreters continue to work with no oversight, leading to incompetent interpreting, including ethical violations. In the 33 years I have served as Spanish-language interpreter for Administrative Hearings as well as for medical events, I have certainly seen some interpreter misconduct. In my opinion, when there is a complaint from any party, evidence should be required (evidence that includes all pertinent information)., and in addition, this should be applied to all interpreters (certified, registered and credentialed), and for all languages. The current Revised Credentialed Review Procedures proposal as written, requires revisions and much input, especially from court-certified interpreters.	The committee appreciates the concern regarding equitable application across all credentialed languages. The next draft will clarify that the same substantive threshold and procedural protections apply regardless of language and that the Judicial Council will make every effort to create a skills assessment process in every certified language as some are currently in development.
48.	Maria A. Pellicciari California Certified/Registered Court Interpreter, Italian & Spanish; Gardena	AM	To the Judicial Council and Court Interpreters Advisory Panel: I am a California court interpreter and respectfully submit the following comments regarding SP26-04, Proposed Revisions to the California Court Interpreter Credential Review Procedures. I support maintaining high	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an

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			professional standards for court interpreters and believe that the public deserves qualified, ethical, and competent language access services. However, I have serious concerns regarding several aspects of the proposed changes. Public Disciplinary Letters Without Formal Due Process The proposal authorizes the Court Interpreters Program (CIP) to issue disciplinary letters and publicly post the subject and terms of those letters on an interpreter's Master List record. This is concerning because a disciplinary letter could become part of an interpreter's permanent public professional record without a hearing before the Office of Administrative Hearings, without findings by an Administrative Law Judge, and without the procedural protections traditionally associated with formal discipline. A public disciplinary posting can affect an interpreter's professional reputation, future employment opportunities, and standing within the profession. Such consequences should not occur without full due process protections and independent review. Unclear Standards for Skills Assessments The proposal creates a mandatory skills assessment process but does not clearly identify the standards by which interpreters will be evaluated. California's credentialing system already establishes the qualifications necessary to become a certified or registered court interpreter. The proposal appears to create a new layer of evaluation without clearly identifying the performance standard, scoring criteria, appeal rights, evaluator accountability, or protections against subjective judgments. Court interpretation is a highly complex profession performed in real time under constantly changing conditions. Unlike a controlled testing environment, interpreters routinely work through background noise, overlapping speakers, poor acoustics, lowvolume speakers, rapid speech, trailing words, incomplete sentences, regional accents, emotional testimony, legal terminology, terms of art, and unexpected subject matter. Judges, attorneys, witnesses, and litigants often speak at speeds significantly faster than normal	intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification

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			conversational speech. Interpreters frequently raise concerns regarding these communication barriers and environmental impediments, yet those concerns are not always addressed before interpretation continues. Even highly skilled interpreters may occasionally encounter unfamiliar terminology, momentary word-retrieval difficulties, or difficult speech patterns. These realities are inherent in court interpretation and do not necessarily indicate incompetence. The proposal does not adequately explain how evaluators will distinguish between genuine deficiencies in an interpreter's knowledge, skills, and abilities and isolated performance issues caused by difficult courtroom conditions. Mandatory Participation and Potential Discipline The proposal states that participation in the skills assessment process is mandatory and that failure to participate may lead to suspension and possible revocation proceedings. I am concerned that an interpreter could face disciplinary consequences based on a dispute regarding participation in the assessment process itself rather than proven misconduct or incompetence. Before such authority is granted, the Judicial Council should establish clear standards, appeal rights, review procedures, and safeguards to ensure fairness and consistency. Broad Expansion of Rule 2.890 Allegations The proposal also expands the potential use of allegations under California Rule of Court 2.890. Rule 2.890 covers broad areas of professional conduct including accuracy, impartiality, confidentiality, conflicts of interest, professional demeanor, and duties to the court. As written, a wide range of alleged conduct could potentially result in disciplinary letters, corrective actions, skills assessments, retesting requirements, and public disclosure before formal adjudication has occurred. Impact on Represented Employee Interpreters Many court interpreters are represented employees working under negotiated Memoranda of Understanding that contain disciplinary procedures, representation rights, grievance procedures, and due process protections. I am concerned that the	examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to

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			proposed credential review process could be used to address issues that are already covered by existing disciplinary systems negotiated between courts and employee organizations. Credential review should not become an alternative pathway that bypasses established disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. If implementation of these procedures affects represented employees, the Judicial Council and courts should ensure that applicable meet-and-confer obligations are satisfied and that negotiated labor protections are respected. Requested Revisions I respectfully request that the Judicial Council: Remove the provision authorizing public posting of disciplinary letters that have not been adjudicated through a formal hearing process. Establish clear, objective, validated, and transparent standards for skills assessments. Provide meaningful appeal rights and independent review of assessment results. Clarify how environmental and courtroom conditions will be considered when evaluating interpreter performance. Ensure that credential review procedures do not circumvent negotiated disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. Preserve full due process protections before disciplinary actions become public. Include Union Representation in the Development and Oversight Process. The Judicial Council should include representatives of the California Federation of Interpreters and other interpreter stakeholders in the development, implementation, and ongoing review of the skills assessment and credential review process. Conclusion Court interpreters play a critical role in protecting access to justice and meaningful participation in judicial proceedings. Any system designed to evaluate interpreter competence or impose discipline should be fair, transparent, objective, and respectful of both professional standards and due process rights. I respectfully urge the	reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). A skills assessment would not be required merely because a complaint is filed. It would be required only when the credential review process determines that an assessment is necessary to evaluate a legitimate concern regarding interpreting skills. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. No skills assessment or disciplinary action would be imposed without supporting evidence. Once an assessment is appropriately required, participation is necessary for the Judicial Council to determine whether further action, remediation, or no action is warranted.

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			Judicial Council to revise SP26-04 before adoption. Thank you for your consideration.	The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. Credential review and trial court employment discipline serve distinct, though sometimes related, purposes. Trial courts remain responsible for addressing employment matters, including any applicable collective bargaining, representation, grievance, and due process requirements. These actions are focused on an interpreter's employment with the trial court. In contrast, the Judicial Council's credential review process is focused specifically on an interpreter's statewide credential and its responsibility to maintain the integrity of that credential. While the same conduct may give rise to both employment-related and credentialing concerns, each process addresses a different interest and operates within

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				its respective authority. The credential review process is not intended to replace, duplicate, or circumvent applicable employment processes or protections. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.
49.	Sofia Roman Petriz California Certified/Registered	AM	To the Judicial Council and Court Interpreters Advisory Panel: I am a California court interpreter and respectfully	The Court Interpreters Program (CIP) receives approximately 12 complaints

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	Court Interpreter, Spanish/English; Whittier		submit the following comments regarding SP26-04, Proposed Revisions to the California Court Interpreter Credential Review Procedures. I support maintaining high professional standards for court interpreters and believe that the public deserves qualified, ethical, and competent language access services. However, I have serious concerns regarding several aspects of the proposed changes. Public Disciplinary Letters Without Formal Due Process The proposal authorizes the Court Interpreters Program (CIP) to issue disciplinary letters and publicly post the subject and terms of those letters on an interpreter's Master List record. This is concerning because a disciplinary letter could become part of an interpreter's permanent public professional record without a hearing before the Office of Administrative Hearings, without findings by an Administrative Law Judge, and without the procedural protections traditionally associated with formal discipline. A public disciplinary posting can affect an interpreter's professional reputation, future employment opportunities, and standing within the profession. Such consequences should not occur without full due process protections and independent review. Unclear Standards for Skills Assessments The proposal creates a mandatory skills assessment process but does not clearly identify the standards by which interpreters will be evaluated. California's credentialing system already establishes the qualifications necessary to become a certified or registered court interpreter. The proposal appears to create a new layer of evaluation without clearly identifying the performance standard, scoring criteria, appeal rights, evaluator accountability, or protections against subjective judgments. Court interpretation is a highly complex profession performed in real time under constantly changing conditions. Unlike a controlled testing environment, interpreters routinely work through background noise, overlapping speakers, poor acoustics, lowvolume speakers, rapid speech, trailing words, incomplete sentences, regional accents, emotional	each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter.

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			testimony, legal terminology, terms of art, and unexpected subject matter. Judges, attorneys, witnesses, and litigants often speak at speeds significantly faster than normal conversational speech. Interpreters frequently raise concerns regarding these communication barriers and environmental impediments, yet those concerns are not always addressed before interpretation continues. Even highly skilled interpreters may occasionally encounter unfamiliar terminology, momentary word-retrieval difficulties, or difficult speech patterns. These realities are inherent in court interpretation and do not necessarily indicate incompetence. The proposal does not adequately explain how evaluators will distinguish between genuine deficiencies in an interpreter's knowledge, skills, and abilities and isolated performance issues caused by difficult courtroom conditions. Mandatory Participation and Potential Discipline The proposal states that participation in the skills assessment process is mandatory and that failure to participate may lead to suspension and possible revocation proceedings. I am concerned that an interpreter could face disciplinary consequences based on a dispute regarding participation in the assessment process itself rather than proven misconduct or incompetence. Before such authority is granted, the Judicial Council should establish clear standards, appeal rights, review procedures, and safeguards to ensure fairness and consistency. Broad Expansion of Rule 2.890 Allegations The proposal also expands the potential use of allegations under California Rule of Court 2.890. Rule 2.890 covers broad areas of professional conduct including accuracy, impartiality, confidentiality, conflicts of interest, professional demeanor, and duties to the court. As written, a wide range of alleged conduct could potentially result in disciplinary letters, corrective actions, skills assessments, retesting requirements, and public disclosure before formal adjudication has occurred. Impact on Represented Employee Interpreters Many court interpreters are represented employees working under negotiated	The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process.

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			Memoranda of Understanding that contain disciplinary procedures, representation rights, grievance procedures, and due process protections. I am concerned that the proposed credential review process could be used to address issues that are already covered by existing disciplinary systems negotiated between courts and employee organizations. Credential review should not become an alternative pathway that bypasses established disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. If implementation of these procedures affects represented employees, the Judicial Council and courts should ensure that applicable meet-and-confer obligations are satisfied and that negotiated labor protections are respected. Requested Revisions I respectfully request that the Judicial Council: Remove the provision authorizing public posting of disciplinary letters that have not been adjudicated through a formal hearing process. Establish clear, objective, validated, and transparent standards for skills assessments. Provide meaningful appeal rights and independent review of assessment results. Clarify how environmental and courtroom conditions will be considered when evaluating interpreter performance. Ensure that credential review procedures do not circumvent negotiated disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. Preserve full due process protections before disciplinary actions become public. Include Union Representation in the Development and Oversight Process. The Judicial Council should include representatives of the California Federation of Interpreters and other interpreter stakeholders in the development, implementation, and ongoing review of the skills assessment and credential review process. Conclusion Court interpreters play a critical role in protecting access to justice and meaningful participation in judicial proceedings. Any system designed to evaluate interpreter	The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). A skills assessment would not be required merely because a complaint is filed. It would be required only when the credential review process determines that an assessment is necessary to evaluate a legitimate concern regarding interpreting skills. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. No skills assessment or disciplinary action would be imposed without supporting evidence. Once an assessment is appropriately required,

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			competence or impose discipline should be fair, transparent, objective, and respectful of both professional standards and due process rights. I respectfully urge the Judicial Council to revise SP26-04 before adoption. Thank you for your consideration.	participation is necessary for the Judicial Council to determine whether further action, remediation, or no action is warranted. The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. Credential review and trial court employment discipline serve distinct, though sometimes related, purposes. Trial courts remain responsible for addressing employment matters, including any applicable collective bargaining, representation, grievance, and due process requirements. These actions are focused on an interpreter's employment with the trial court. In contrast, the Judicial Council's credential review process is focused specifically on an interpreter's statewide credential and its responsibility to maintain the integrity of that credential. While the same

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				conduct may give rise to both employment-related and credentialing concerns, each process addresses a different interest and operates within its respective authority. The credential review process is not intended to replace, duplicate, or circumvent applicable employment processes or protections. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the

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				skills-assessment process is implemented, evaluated, and refined.
50.	Claudia Pettit California Certified Court Interpreter, Spanish; Los Angeles	AM	To the Judicial Council and Court Interpreters Advisory Panel: I am a California court interpreter and respectfully submit the following comments regarding SP26-04, Proposed Revisions to the California Court Interpreter Credential Review Procedures. I support maintaining high professional standards for court interpreters and believe that the public deserves qualified, ethical, and competent language access services. However, I have serious concerns regarding several aspects of the proposed changes. Public Disciplinary Letters Without Formal Due Process The proposal authorizes the Court Interpreters Program (CIP) to issue disciplinary letters and publicly post the subject and terms of those letters on an interpreter's Master List record. This is concerning because a disciplinary letter could become part of an interpreter's permanent public professional record without a hearing before the Office of Administrative Hearings, without findings by an Administrative Law Judge, and without the procedural protections traditionally associated with formal discipline. A public disciplinary posting can affect an interpreter's professional reputation, future employment opportunities, and standing within the profession. Such consequences should not occur without full due process protections and independent review. Unclear Standards for Skills Assessments The proposal creates a mandatory skills assessment process but does not clearly identify the standards by which interpreters will be evaluated. California's credentialing system already establishes the qualifications necessary to become a certified or registered court interpreter. The proposal appears to create a new layer of evaluation without clearly identifying the performance standard, scoring criteria, appeal rights, evaluator accountability, or protections against subjective judgments. Court interpretation is a highly complex profession performed in real time under constantly changing conditions. Unlike a controlled testing	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter

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			environment, interpreters routinely work through background noise, overlapping speakers, poor acoustics, lowvolume speakers, rapid speech, trailing words, incomplete sentences, regional accents, emotional testimony, legal terminology, terms of art, and unexpected subject matter. Judges, attorneys, witnesses, and litigants often speak at speeds significantly faster than normal conversational speech. Interpreters frequently raise concerns regarding these communication barriers and environmental impediments, yet those concerns are not always addressed before interpretation continues. Even highly skilled interpreters may occasionally encounter unfamiliar terminology, momentary word-retrieval difficulties, or difficult speech patterns. These realities are inherent in court interpretation and do not necessarily indicate incompetence. The proposal does not adequately explain how evaluators will distinguish between genuine deficiencies in an interpreter's knowledge, skills, and abilities and isolated performance issues caused by difficult courtroom conditions. Mandatory Participation and Potential Discipline The proposal states that participation in the skills assessment process is mandatory and that failure to participate may lead to suspension and possible revocation proceedings. I am concerned that an interpreter could face disciplinary consequences based on a dispute regarding participation in the assessment process itself rather than proven misconduct or incompetence. Before such authority is granted, the Judicial Council should establish clear standards, appeal rights, review procedures, and safeguards to ensure fairness and consistency. Broad Expansion of Rule 2.890 Allegations The proposal also expands the potential use of allegations under California Rule of Court 2.890. Rule 2.890 covers broad areas of professional conduct including accuracy, impartiality, confidentiality, conflicts of interest, professional demeanor, and duties to the court. As written, a wide range of alleged conduct could potentially result in disciplinary letters, corrective actions, skills assessments, retesting	on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and

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			requirements, and public disclosure before formal adjudication has occurred. Impact on Represented Employee Interpreters Many court interpreters are represented employees working under negotiated Memoranda of Understanding that contain disciplinary procedures, representation rights, grievance procedures, and due process protections. I am concerned that the proposed credential review process could be used to address issues that are already covered by existing disciplinary systems negotiated between courts and employee organizations. Credential review should not become an alternative pathway that bypasses established disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. If implementation of these procedures affects represented employees, the Judicial Council and courts should ensure that applicable meet-and-confer obligations are satisfied and that negotiated labor protections are respected. Requested Revisions I respectfully request that the Judicial Council: Remove the provision authorizing public posting of disciplinary letters that have not been adjudicated through a formal hearing process. Establish clear, objective, validated, and transparent standards for skills assessments. Provide meaningful appeal rights and independent review of assessment results. Clarify how environmental and courtroom conditions will be considered when evaluating interpreter performance. Ensure that credential review procedures do not circumvent negotiated disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. Preserve full due process protections before disciplinary actions become public. Include Union Representation in the Development and Oversight Process. The Judicial Council should include representatives of the California Federation of Interpreters and other interpreter stakeholders in the development, implementation, and ongoing review of the skills	practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). A skills assessment would not be required merely because a complaint is filed. It would be required only when the credential review process determines that an assessment is necessary to evaluate a legitimate concern regarding interpreting skills. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. No skills assessment or

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			assessment and credential review process. Conclusion Court interpreters play a critical role in protecting access to justice and meaningful participation in judicial proceedings. Any system designed to evaluate interpreter competence or impose discipline should be fair, transparent, objective, and respectful of both professional standards and due process rights. I respectfully urge the Judicial Council to revise SP26-04 before adoption. Thank you for your consideration.	disciplinary action would be imposed without supporting evidence. Once an assessment is appropriately required, participation is necessary for the Judicial Council to determine whether further action, remediation, or no action is warranted. The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. Credential review and trial court employment discipline serve distinct, though sometimes related, purposes. Trial courts remain responsible for addressing employment matters, including any applicable collective bargaining, representation, grievance, and due process requirements. These actions are focused on an interpreter's employment with the trial court. In contrast, the Judicial Council's credential review process is focused specifically on an interpreter's

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				statewide credential and its responsibility to maintain the integrity of that credential. While the same conduct may give rise to both employment-related and credentialing concerns, each process addresses a different interest and operates within its respective authority. The credential review process is not intended to replace, duplicate, or circumvent applicable employment processes or protections. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections.

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				The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.
51.	Lorena Pike California and Nevada Certified Court Interpreter; Spanish Certified Court Interpreter and Trainer; Oakland	N	I'm a California and Nevada certified court interpreter with an M.A. in Spanish and Hispanic Studies. I teach court interpretation at UCSD Extended Studies, I have developed curricula for colleges and universities on legal interpreting and translation, including Santa Barbara City College and University of Caifornia, Santa Barbara. I taight ta UCLA Extension's Legal Translation and Interpreting Certificate for several years, and I build and deliver approved continuing education for court interpreters in California, Nevada, Arizona, Colorado, and Oregon. I've also served as an expert witness on questions of interpretation and language. I am writing in strong opposition to SP26-04—not because of the paperwork, but because the tool at the center of this proposal can't do what you're saying it will do. The process starts with a complaint nobody has checked. Most complaints about a bad interpretation come from people who don't speak both languages. They can't. They're telling you what they think they heard. I've been hired as an expert witness for exactly this reason—figuring out whether an interpretation was actually wrong takes training that the people in the courtroom usually don't have. What sounds like an omission is often correct compression. What sounds like a mistranslation is often an accurate rendering of a witness who was vague, evasive, or speaking a register the listener doesn't know. That's a linguistic call, not a gut feeling. This has happened to me numerous times in my practice as court interpreter. The Council already knows this. Its own Ethics Guide tells us that when someone challenges our interpretation, we should research it, and if we're right, stand by it—and it even says we can point out that we're certified by the State of California and the person challenging us isn't. The Guide treats a challenge as normal. Not as proof of	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to

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			anything. But SP26-04 lets that same untrained impression start the whole machine. Nothing in the proposal requires anyone to establish that an error actually happened before an interpreter gets sent to assessment, handed a disciplinary letter, or ordered to retake the exams. And because a disciplinary letter skips the charging document, no neutral judge ever looks at whether the complaint was any good in the first place. The Council would punish me for a mistake it never proved I made, because someone who couldn't tell said I made it. The assessment doesn't measure the job. The proposal describes a virtual assessment— prepared recordings, scripts, scenarios that "mirror typical court interactions," scored by two evaluators with a rubric. But court interpreting isn't a script. It's overlapping speech. It's a witness who mumbles. It's bad acoustics, a defendant who shifts from legal register to slang mid-sentence, a regionalism you've never heard, an attorney talking over the judge, and several hours of fatigue because we frequently work solo. That's the job. A clean recording in a quiet room strips out every single one of those variables— the exact variables that make this work hard. So when that instrument says an interpreter shows "substantive deficiency," what it has really shown is that she performed well or badly at a task that isn't the job. And you can't have it both ways. The proposal says the assessment is "not intended to be a pass/fail assessment" and "will not be used as the final determination of an interpreter's credential"— and then says a substantive deficiency "may be the basis for additional sanctions," including retaking the exams, suspension, and revocation proceedings. It's either a diagnostic tool or it's a disciplinary one. If you're going to take someone's credential with it, you have to defend it as a valid measure of real courtroom interpreting. You haven't. You're punishing interpreters for a problem you created. I train interpreters. The performance problems I see aren't coming from people who can't do the work. They're coming from people who were put in a room they weren't ready for. A newly certified interpreter who passed the	OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed

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			exams still needs mentoring and supervised practice before she's handed a trial, expert testimony, or a suppression hearing. That's where competence actually gets built. But coordinators and managers put new certs straight into these cases all the time, because they're short-staffed and someone has to cover it. Your own 2025 Interpreter Workforce Study says this out loud and recommends building apprenticeship and mentorship programs. SP26-04 does nothing about that. It just builds a faster way to assess and discipline the interpreter while leaving the assignment practices completely untouched. You'd be turning a staffing problem into a professional misconduct problem, and making the interpreter carry it. If the goal is actually better interpretation, then build the mentoring your own study asked for. Don't build a punishment for the failure you set her up for. For indigenous and less-common languages, this doesn't just fail — it makes no sense. The proposal admits that where there's no Oral Proficiency Exam in the credentialed language, CIP "may still administer the assessment as well as require a retest with the English OPE." It also admits that for some languages, "evaluators with the requisite credentials to assist with the assessment are not available." Think about what that means for an interpreter of Mixteco, Triqui, K'iche', Mam, Zapoteco, or Nahuatl. The registered pathway for those languages tests English only — because there is no Oral Proficiency Exam in them. The Council has never once tested these interpreters in their working language. It has no instrument to do it. And now, under this proposal, the Council would assess their competence anyway — possibly with no evaluator who speaks the language at all — make them retest in English, and then use the results as grounds for a credential review hearing. You would be judging someone's competence in a language you cannot test, cannot evaluate, and never certified. That's not an objective assessment. The outcome is decided by your own inability to measure the thing you're asking about. These are the interpreters serving the most underserved LEP	by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone does not establish a violation or

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			communities in this state. There are almost none of them. If you expose them to losing their credential based on an assessment that can't actually evaluate them, you won't improve language access. You'll destroy what little there is. Don't adopt SP26-04 as written. Before you use any assessment as grounds for sanctions, show that it's a valid and reliable measure of real courtroom interpreting. Leave out the languages you can't validly assess — don't substitute a test of something else. And put your resources into the mentoring and apprenticeship programs your own workforce study already told you we need. That's the thing that would actually prevent the failures you're trying to punish.	automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.

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				The committee appreciates the concern regarding equitable application across all credentialed languages. The next draft will clarify that the same substantive threshold and procedural protections apply regardless of language and that the Judicial Council will make every effort to create a skills assessment process in every certified language as some are currently in development.
52.	Marcelo Poppi Court Interpreter	AM	To the Judicial Council and Court Interpreters Advisory Panel: I am a California court interpreter and respectfully submit the following comments regarding SP26-04, Proposed Revisions to the California Court Interpreter Credential Review Procedures. Of course, I, like everyone else, support maintaining high professional standards for court interpreters and believe that the public deserves qualified, ethical, and competent language access services. However, I have serious concerns regarding several aspects of the proposed changes. One thing that most worries me is the unclear standards for skills assessments. The proposal creates a mandatory skills assessment process but does not clearly identify the standards by which interpreters will be evaluated. California's credentialing system already establishes the qualifications necessary to become a certified or registered court interpreter. The proposal appears to create a new layer of evaluation without clearly identifying the performance standard, scoring criteria, appeal rights, evaluator accountability, or protections against subjective judgments. Court interpretation is a highly complex profession performed in real time under constantly changing conditions. Unlike a controlled testing environment, interpreters routinely work through background noise, overlapping speakers, poor acoustics, low-volume speakers, rapid speech, trailing words, incomplete sentences, regional accents, emotional	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made.

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			testimony, legal terminology, terms of art, and unexpected subject matter. Judges, attorneys, witnesses, and litigants often speak at speeds significantly faster than normal conversational speech. Interpreters frequently raise concerns regarding these communication barriers and environmental impediments, yet those concerns are not always addressed before interpretation continues. Even highly skilled interpreters may occasionally encounter unfamiliar terminology, momentary word-retrieval difficulties, or difficult speech patterns. These realities are inherent in court interpretation and do not necessarily indicate incompetence. The proposal does not adequately explain how evaluators will distinguish between genuine deficiencies in an interpreter's knowledge, skills, and abilities and isolated performance issues caused by difficult courtroom conditions. Another concern is that participation is mandatory and could lead to potential discipline. The proposal states that participation in the skills assessment process is mandatory and that failure to participate may lead to suspension and possible revocation proceedings. This is worrying because an interpreter could face disciplinary consequences based on a dispute regarding participation in the assessment process itself rather than proven misconduct or incompetence. Before such authority is granted, the Judicial Council should establish clear standards, appeal rights, review procedures, and safeguards to ensure fairness and consistency. I am also concerned that the proposed credential review process could be used to address issues that are already covered by existing disciplinary systems negotiated between courts and employee organizations. Many court interpreters are represented employees working under negotiated Memoranda of Understanding that contain disciplinary procedures, representation rights, grievance procedures, and due process protections. Credential review should not become an alternative pathway that bypasses established disciplinary procedures, union representation rights, grievance procedures, or other protections contained in	However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises

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			collective bargaining agreements. In other words, I believe there is a real danger that court administrations will see this as another disciplinary tool rather than as a way to ensure the quality of their employees' interpretation. Sadly the way that the administration has treated us interpreters in the past doesn't make me any more confident that they will use it as intended. Public Disciplinary Letters Without Formal Due Process The proposal authorizes the Court Interpreters Program (CIP) to issue disciplinary letters and publicly post the subject and terms of those letters on an interpreter's Master List record. This is concerning because a disciplinary letter could become part of an interpreter's permanent public professional record without a hearing before the Office of Administrative Hearings, without findings by an Administrative Law Judge, and without the procedural protections traditionally associated with formal discipline. A public disciplinary posting can affect an interpreter's professional reputation, future employment opportunities, and standing within the profession. Such consequences should not occur without full due process protections and independent review. Broad Expansion of Rule 2.890 Allegations The proposal also expands the potential use of allegations under California Rule of Court 2.890. Rule 2.890 covers broad areas of professional conduct including accuracy, impartiality, confidentiality, conflicts of interest, professional demeanor, and duties to the court. As written, a wide range of alleged conduct could potentially result in disciplinary letters, corrective actions, skills assessments, retesting requirements, and public disclosure before formal adjudication has occurred. If implementation of these procedures affects represented employees, the Judicial Council and courts should ensure that applicable meet-and-confer obligations are satisfied and that negotiated labor protections are respected. Requested Revisions I respectfully request that the Judicial Council: 1. Remove the provision authorizing public posting of disciplinary letters that have not been adjudicated through a formal hearing process. 2. Establish	concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH).

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			clear, objective, validated, and transparent standards for skills assessments. 3. Provide meaningful appeal rights and independent review of assessment results. 4. Clarify how environmental and courtroom conditions will be considered when evaluating interpreter performance. 5. Ensure that credential review procedures do not circumvent negotiated disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. 6. Preserve full due process protections before disciplinary actions become public. Include Union Representation in the Development and Oversight Process. The Judicial Council should include representatives of the California Federation of Interpreters and other interpreter stakeholders in the development, implementation, and ongoing review of the skills assessment and credential review process. Conclusion Court interpreters play a critical role in protecting access to justice and meaningful participation in judicial proceedings. Any system designed to evaluate interpreter competence or impose discipline should be fair, transparent, objective, and respectful of both professional standards and due process rights. It should also keep be designed to avoid the possibility that it be used as a disciplinary or punishment tool by an employer. I respectfully urge the Judicial Council to revise SP26-04 before adoption. Thank you for your consideration.	A skills assessment would not be required merely because a complaint is filed. It would be required only when the credential review process determines that an assessment is necessary to evaluate a legitimate concern regarding interpreting skills. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. No skills assessment or disciplinary action would be imposed without supporting evidence. Once an assessment is appropriately required, participation is necessary for the Judicial Council to determine whether further action, remediation, or no action is warranted. The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made.

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				Credential review and trial court employment discipline serve distinct, though sometimes related, purposes. Trial courts remain responsible for addressing employment matters, including any applicable collective bargaining, representation, grievance, and due process requirements. These actions are focused on an interpreter's employment with the trial court. In contrast, the Judicial Council's credential review process is focused specifically on an interpreter's statewide credential and its responsibility to maintain the integrity of that credential. While the same conduct may give rise to both employment-related and credentialing concerns, each process addresses a different interest and operates within its respective authority. The credential review process is not intended to replace, duplicate, or circumvent applicable employment processes or protections. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately

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				without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.
53.	Carmen Beatriz Ramirez California Certified Spanish Court Interpreter	AM	To the Judicial Council and Court Interpreters Advisory Panel: I am a California court interpreter and respectfully submit the following comments regarding SP26-04, Proposed Revisions to the California Court Interpreter Credential Review Procedures. Of course, I, like everyone else, support maintaining high professional standards for court interpreters and believe that the public deserves qualified, ethical, and competent language access services. However, I have serious concerns regarding several aspects of the proposed changes. One thing that most worries me is the unclear standards for skills assessments. The proposal creates a mandatory skills assessment process but does not clearly identify the standards by which interpreters will be evaluated. California's credentialing system already establishes the qualifications necessary to become a certified or registered court interpreter. The proposal appears to create a new layer of evaluation without clearly identifying the performance standard, scoring criteria, appeal rights, evaluator accountability, or protections	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not

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			against subjective judgments. Court interpretation is a highly complex profession performed in real time under constantly changing conditions. Unlike a controlled testing environment, interpreters routinely work through background noise, overlapping speakers, poor acoustics, low-volume speakers, rapid speech, trailing words, incomplete sentences, regional accents, emotional testimony, legal terminology, terms of art, and unexpected subject matter. Judges, attorneys, witnesses, and litigants often speak at speeds significantly faster than normal conversational speech. Interpreters frequently raise concerns regarding these communication barriers and environmental impediments, yet those concerns are not always addressed before interpretation continues. Even highly skilled interpreters may occasionally encounter unfamiliar terminology, momentary word-retrieval difficulties, or difficult speech patterns. These realities are inherent in court interpretation and do not necessarily indicate incompetence. The proposal does not adequately explain how evaluators will distinguish between genuine deficiencies in an interpreter's knowledge, skills, and abilities and isolated performance issues caused by difficult courtroom conditions. Another concern is that participation is mandatory and could lead to potential discipline. The proposal states that participation in the skills assessment process is mandatory and that failure to participate may lead to suspension and possible revocation proceedings. This is worrying because an interpreter could face disciplinary consequences based on a dispute regarding participation in the assessment process itself rather than proven misconduct or incompetence. Before such authority is granted, the Judicial Council should establish clear standards, appeal rights, review procedures, and safeguards to ensure fairness and consistency. I am also concerned that the proposed credential review process could be used to address issues that are already covered by existing disciplinary systems negotiated between courts and employee organizations. Many court interpreters are	result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center

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			represented employees working under negotiated Memoranda of Understanding that contain disciplinary procedures, representation rights, grievance procedures, and due process protections. Credential review should not become an alternative pathway that bypasses established disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. In other words, I believe there is a real danger that court administrations will see this as another disciplinary tool rather than as a way to ensure the quality of their employees' interpretation. Sadly the way that the administration has treated us interpreters in the past doesn't make me any more confident that they will use it as intended. Public Disciplinary Letters Without Formal Due Process The proposal authorizes the Court Interpreters Program (CIP) to issue disciplinary letters and publicly post the subject and terms of those letters on an interpreter's Master List record. This is concerning because a disciplinary letter could become part of an interpreter's permanent public professional record without a hearing before the Office of Administrative Hearings, without findings by an Administrative Law Judge, and without the procedural protections traditionally associated with formal discipline. A public disciplinary posting can affect an interpreter's professional reputation, future employment opportunities, and standing within the profession. Such consequences should not occur without full due process protections and independent review. Broad Expansion of Rule 2.890 Allegations The proposal also expands the potential use of allegations under California Rule of Court 2.890. Rule 2.890 covers broad areas of professional conduct including accuracy, impartiality, confidentiality, conflicts of interest, professional demeanor, and duties to the court. As written, a wide range of alleged conduct could potentially result in disciplinary letters, corrective actions, skills assessments, retesting requirements, and public disclosure before formal adjudication has occurred. If implementation of these procedures affects represented	for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are

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			employees, the Judicial Council and courts should ensure that applicable meet-and-confer obligations are satisfied and that negotiated labor protections are respected. Requested Revisions I respectfully request that the Judicial Council: 1. Remove the provision authorizing public posting of disciplinary letters that have not been adjudicated through a formal hearing process. 2. Establish clear, objective, validated, and transparent standards for skills assessments. 3. Provide meaningful appeal rights and independent review of assessment results. 4. Clarify how environmental and courtroom conditions will be considered when evaluating interpreter performance. 5. Ensure that credential review procedures do not circumvent negotiated disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. 6. Preserve full due process protections before disciplinary actions become public. Include Union Representation in the Development and Oversight Process. The Judicial Council should include representatives of the California Federation of Interpreters and other interpreter stakeholders in the development, implementation, and ongoing review of the skills assessment and credential review process. Conclusion Court interpreters play a critical role in protecting access to justice and meaningful participation in judicial proceedings. Any system designed to evaluate interpreter competence or impose discipline should be fair, transparent, objective, and respectful of both professional standards and due process rights. It should also keep be designed to avoid the possibility that it be used as a disciplinary or punishment tool by an employer. I respectfully urge the Judicial Council to revise SP26-04 before adoption. Thank you for your consideration.	appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). A skills assessment would not be required merely because a complaint is filed. It would be required only when the credential review process determines that an assessment is necessary to evaluate a legitimate concern regarding interpreting skills. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. No skills assessment or disciplinary action would be imposed without supporting evidence. Once an assessment is appropriately required, participation is necessary for the Judicial Council to determine whether further action, remediation, or no action is warranted. The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with

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				notice of the concerns and an opportunity to respond before a determination is made. Credential review and trial court employment discipline serve distinct, though sometimes related, purposes. Trial courts remain responsible for addressing employment matters, including any applicable collective bargaining, representation, grievance, and due process requirements. These actions are focused on an interpreter's employment with the trial court. In contrast, the Judicial Council's credential review process is focused specifically on an interpreter's statewide credential and its responsibility to maintain the integrity of that credential. While the same conduct may give rise to both employment-related and credentialing concerns, each process addresses a different interest and operates within its respective authority. The credential review process is not intended to replace, duplicate, or circumvent applicable employment processes or protections. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important

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				intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.
54.	Carmen Ramos California Federation of Interpreters (CFI); Long Beach	AM	Dear Members of the Court Interpreters Advisory Panel: The California Federation of Interpreters (CFI) appreciates the opportunity to comment on SP26-04, the proposed revisions to the California Court Interpreter Credential Review Procedures. CFI supports maintaining high professional standards for California court interpreters and agrees that the Judicial Council has a legitimate interest in protecting the integrity of interpreter credentials and ensuring meaningful language access for court users. Interpreters play a critical role in protecting access to justice and preserving the due process rights of limited-English proficient individuals. However, while the stated objectives of the proposal are understandable, CFI has significant concerns regarding the proposed skills assessment process, the creation of public disciplinary letters, the expansion of administrative disciplinary	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct.

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			authority, the lack of procedural safeguards, and the potential impact on represented court employees. For the reasons outlined below, CFI urges the Judicial Council to substantially revise SP26-04 before adoption. I. Public Disciplinary Letters Lack Fundamental Due Process Protections The proposal authorizes the Court Interpreters Program (CIP) to issue disciplinary letters and publicly post the subject and terms of those letters on an interpreter's Master List record. CFI strongly opposes this provision. The proposal creates a form of public discipline that may occur without a hearing before the Office of Administrative Hearings, without findings by an Administrative Law Judge, and without the procedural protections traditionally associated with formal disciplinary proceedings. The publication of a disciplinary letter has the potential to damage an interpreter's professional reputation, employment opportunities, contractual opportunities, and standing within the profession. Such consequences are disciplinary in nature regardless of the terminology used to describe them. If disciplinary information is to be publicly disclosed, that disclosure should occur only after formal adjudication and a final determination supported by appropriate due process protections. CFI therefore recommends that all provisions authorizing the public posting of disciplinary letters be removed. II. The Proposed Skills Assessment Lacks Sufficient Standards and Safeguards The proposal establishes a new skills assessment process but provides little information regarding the standards that will govern its administration and use. The proposal does not adequately identify: • Minimum performance standards; • Scoring methodologies; • Reliability and validity measures; • Appeal rights; • Procedures for challenging evaluator conclusions; • Evaluator qualifications and accountability standards; • Language-specific assessment criteria; • Protections against subjective evaluation. California's interpreter credentialing system already establishes the qualifications necessary to become a certified or registered	A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech,

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			court interpreter. The proposal appears to create a second layer of competence evaluation without clearly identifying the performance standards that will govern that evaluation. CFI is particularly concerned that the proposal authorizes the use of assessment results to support discipline, mandatory training, retesting, suspension, revocation proceedings, and public disclosure without first establishing clear procedural safeguards. Before any assessment process is implemented, the Judicial Council should publish detailed standards and provide interpreters with meaningful rights to review, challenge, and appeal assessment findings. III. Complaints May Be Filed Without Considering Conditions That Affect Interpretation Delivery CFI is concerned that complaints regarding interpreter performance may be filed without fully considering the courtroom conditions that affected the interpreter's ability to hear, process, and accurately interpret the communication. Interpreters can only interpret what they can fully hear and understand. Court interpreters routinely work through rapid speech, overlapping speakers, low-volume speakers, mumbling, trailing words, poor acoustics, background noise, audio and technology problems, regional accents, emotional testimony, incomplete statements, legal terminology, idiomatic expressions, and unexpected subject matter. When these conditions are present, the issue may not be interpreter incompetence. The issue may be that the interpreter was not provided a fair opportunity to hear and interpret the communication accurately. Interpreters frequently raise concerns about these barriers and ask speakers to slow down, repeat, speak louder, use microphones, avoid overlapping speech, or clarify unclear statements. Those requests are not always granted or consistently enforced. The proposed procedures do not adequately explain how CIP will screen complaints to determine whether alleged performance issues were caused or influenced by environmental factors outside the interpreter's control. Nor do they explain how such factors will be documented,	poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine

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			weighed, or considered before an interpreter is referred for skills assessment, corrective action, discipline, retesting, suspension, revocation proceedings, or public disclosure. Any credential review process involving alleged interpretation errors must require a careful review of the actual conditions under which the interpretation occurred. Interpreters should not be disciplined for failing to interpret words they could not fully hear or understand. IV. Expansion of Rule 2.890 Allegations Raises Significant Concerns The proposal expands the use of allegations arising under California Rule of Court 2.890. Rule 2.890 governs a broad range of professional obligations, including accuracy, impartiality, confidentiality, conflicts of interest, professional demeanor, and duties to the court. Under the proposal, allegations involving these provisions may result in disciplinary letters, corrective actions, mandatory assessments, retesting requirements, and public disclosure before formal adjudication occurs. CFI is concerned that the proposal significantly expands the range of conduct that may trigger credential review consequences while simultaneously reducing procedural protections. V. Credential Review Should Not Circumvent Established Labor Protections Many California court interpreters are represented employees working under negotiated Memoranda of Understanding that contain disciplinary procedures, representation rights, grievance procedures, and due process protections. CFI is concerned that the proposed credential review process may create a mechanism through which matters traditionally addressed through negotiated workplace procedures are redirected into a credentialing process that lacks equivalent protections or creates a duplicative disciplinary framework. The Judicial Council's authority as a credentialing body should not be used to circumvent established disciplinary procedures, collective bargaining agreements, union representation rights, grievance procedures, or other negotiated protections. Nor should the same underlying allegation, conduct, or performance issue result in multiple	whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. Credential review and trial court employment discipline serve distinct, though sometimes related, purposes. Trial courts remain responsible for addressing employment matters, including any applicable collective bargaining, representation, grievance, and due process requirements. These actions are focused on an interpreter's employment with the trial court. In contrast, the Judicial Council's

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			layers of corrective or disciplinary action through separate employment and credentialing processes without appropriate safeguards and due process protections. Credential review should not become a substitute for employer discipline, nor should it operate as a parallel disciplinary system that exposes interpreters to additional penalties arising from the same alleged conduct. Where allegations involve represented employees, courts should continue to utilize disciplinary processes established through collective bargaining and existing personnel systems. CFI further believes that implementation of any credential review process affecting represented employees should be subject to applicable notice, meet-and-confer, and bargaining obligations. VI. Interpreter Representation Is Necessary CFI is concerned that these significant changes were developed without formal participation by recognized employee organizations representing court interpreters. Because interpreters are the professionals most directly affected by these procedures, their perspectives are essential to ensuring that any assessment process is fair, transparent, objective, and reflective of actual courtroom practice. CFI respectfully requests that the Judicial Council include representatives of recognized interpreter employee organizations in the development, implementation, oversight, and future modification of the credential review and skills assessment process. Meaningful stakeholder participation will improve the quality of the final procedures and help identify unintended consequences before implementation. VII. Requested Revisions CFI respectfully requests that the Judicial Council: 1. Remove all provisions authorizing public posting of disciplinary letters. 2. Suspend implementation of the skills assessment process until objective standards, validation data, appeal rights, and procedural safeguards are established. 3. Clarify that credential review procedures shall not be used to circumvent negotiated disciplinary procedures, union representation rights, grievance procedures, or other collective bargaining protections. 4. Establish meaningful	credential review process is focused specifically on an interpreter's statewide credential and its responsibility to maintain the integrity of that credential. While the same conduct may give rise to both employment-related and credentialing concerns, each process addresses a different interest and operates within its respective authority. The credential review process is not intended to replace, duplicate, or circumvent applicable employment processes or protections. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while

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			appeal rights regarding assessment findings and disciplinary letters. 5. Clarify how environmental and courtroom conditions will be considered when evaluating interpreter performance. 6. Include recognized interpreter employee organizations in the development, implementation, oversight, and future modification of the credential review process. 7. Meet and confer with affected employee organizations regarding any impacts on represented court interpreters. Conclusion California court interpreters support accountability, professionalism, and high standards. However, accountability must be balanced with fairness, transparency, due process, and respect for established labor protections. As currently drafted, SP26-04 grants substantial new authority to impose corrective and disciplinary measures without corresponding procedural safeguards. The proposal risks creating a parallel disciplinary framework that may adversely affect interpreter credentials, professional reputations, and employment interests without adequate protections. CFI respectfully urges the Judicial Council to substantially revise SP26-04 before adoption.	preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.
55.	Blanca Rappē California Certified/Registered Court Interpreter, Spanish; Los Angeles	AM	To the Judicial Council and Court Interpreters Advisory Panel: I am a California court interpreter and respectfully submit the following comments regarding SP26-04, Proposed Revisions to the California Court Interpreter Credential Review Procedures. I support maintaining high professional standards for court interpreters and believe that the public deserves qualified, ethical, and competent language access services. However, I have serious concerns regarding several aspects of the proposed changes. Public Disciplinary Letters Without Formal Due Process: The proposal authorizes the Court Interpreters Program (CIP) to issue disciplinary letters and publicly post the subject and terms of those letters on an interpreter's Master List record. This is concerning because a disciplinary letter could become part of an interpreter's permanent public professional record without a hearing before the Office of Administrative Hearings, without	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct.

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			findings by an Administrative Law Judge, and without the procedural protections traditionally associated with formal discipline. A public disciplinary posting can affect an interpreter's professional reputation, future employment opportunities, and standing within the profession. Such consequences should not occur without full due process protections and independent review. Unclear Standards for Skills Assessments: The proposal creates a mandatory skills assessment process but does not clearly identify the standards by which interpreters will be evaluated. California's credentialing system already establishes the qualifications necessary to become a certified or registered court interpreter. The proposal appears to create a new layer of evaluation without clearly identifying the performance standard, scoring criteria, appeal rights, evaluator accountability, or protections against subjective judgments. Court interpretation is a highly complex profession performed in real time under constantly changing conditions. Unlike a controlled testing environment, interpreters routinely work through background noise, overlapping speakers, poor acoustics, low-volume speakers, rapid speech, trailing words, incomplete sentences, regional accents, emotional testimony, legal terminology, terms of art, and unexpected subject matter. Judges, attorneys, witnesses, and litigants often speak at speeds significantly faster than normal conversational speech. Interpreters frequently raise concerns regarding these communication barriers and environmental impediments, yet those concerns are not always addressed before interpretation continues. Even highly skilled interpreters may occasionally encounter unfamiliar terminology, momentary word-retrieval difficulties, or difficult speech patterns. These realities are inherent in court interpretation and do not necessarily indicate incompetence. The proposal does not adequately explain how evaluators will distinguish between genuine deficiencies in an interpreter's knowledge, skills, and abilities and isolated performance issues caused by difficult	A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech,

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			courtroom conditions. Mandatory Participation and Potential Discipline: The proposal states that participation in the skills assessment process is mandatory and that failure to participate may lead to suspension and possible revocation proceedings. I am concerned that an interpreter could face disciplinary consequences based on a dispute regarding participation in the assessment process itself rather than proven misconduct or incompetence. Before such authority is granted, the Judicial Council should establish clear standards, appeal rights, review procedures, and safeguards to ensure fairness and consistency. Broad Expansion of Rule 2.890 Allegations: The proposal also expands the potential use of allegations under California Rule of Court 2.890. Rule 2.890 covers broad areas of professional conduct including accuracy, impartiality, confidentiality, conflicts of interest, professional demeanor, and duties to the court. As written, a wide range of alleged conduct could potentially result in disciplinary letters, corrective actions, skills assessments, retesting requirements, and public disclosure before formal adjudication has occurred. Impact on Represented Employee Interpreters: Many court interpreters are represented employees working under negotiated Memoranda of Understanding that contain disciplinary procedures, representation rights, grievance procedures, and due process protections. I am concerned that the proposed credential review process could be used to address issues that are already covered by existing disciplinary systems negotiated between courts and employee organizations. Credential review should not become an alternative pathway that bypasses established disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. If implementation of these procedures affects represented employees, the Judicial Council and courts should ensure that applicable meet-and-confer obligations are satisfied and that negotiated labor protections are respected. Requested	poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine

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			Revisions: I respectfully request that the Judicial Council: 1. Remove the provision authorizing public posting of disciplinary letters that have not been adjudicated through a formal hearing process. 2. Establish clear, objective, validated, and transparent standards for skills assessments. 3. Provide meaningful appeal rights and independent review of assessment results. 4. Clarify how environmental and courtroom conditions will be considered when evaluating interpreter performance. 5. Ensure that credential review procedures do not circumvent negotiated disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. 6. Preserve full due process protections before disciplinary actions become public. 7. Include Union Representation in the Development and Oversight Process. The Judicial Council should include representatives of the California Federation of Interpreters and other interpreter stakeholders in the development, implementation, and ongoing review of the skills assessment and credential review process. Conclusion: Court interpreters play a critical role in protecting access to justice and meaningful participation in judicial proceedings. Any system designed to evaluate interpreter competence or impose discipline should be fair, transparent, objective, and respectful of both professional standards and due process rights. I respectfully urge the Judicial Council to revise SP26-04 before adoption. Thank you for your consideration.	whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). A skills assessment would not be required merely because a complaint is filed. It would be required only when the credential review process determines that an assessment is necessary to evaluate a legitimate concern regarding interpreting skills. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. No skills assessment or disciplinary action would be imposed without supporting evidence. Once an assessment is appropriately required, participation is necessary for the Judicial Council to determine whether further action, remediation, or no action is warranted. The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone

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				standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.
56.	Marisol Reséndiz-Garcia California Certified Court Interpreter, Spanish; Modesto	AM	To the Judicial Council and Court Interpreters Advisory Panel: Good morning, I am a California court interpreter and respectfully submit the following comments regarding SP26-04, Proposed Revisions to the California Court Interpreter Credential Review Procedures. I support maintaining high professional standards for court interpreters and believe that the public deserves qualified, ethical, and competent language access services. However, I have serious concerns regarding several aspects of the proposed changes. Public Disciplinary Letters Without Formal Due Process The proposal authorizes the Court	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate

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			Interpreters Program (CIP) to issue disciplinary letters and publicly post the subject and terms of those letters on an interpreter's Master List record. This is concerning because a disciplinary letter could become part of an interpreter's permanent public professional record without a hearing before the Office of Administrative Hearings, without findings by an Administrative Law Judge, and without the procedural protections traditionally associated with formal discipline. A public disciplinary posting can affect an interpreter's professional reputation, future employment opportunities, and standing within the profession. Such consequences should not occur without full due process protections and independent review. Unclear Standards for Skills Assessments The proposal creates a mandatory skills assessment process but does not clearly identify the standards by which interpreters will be evaluated. California's credentialing system already establishes the qualifications necessary to become a certified or registered court interpreter. The proposal appears to create a new layer of evaluation without clearly identifying the performance standard, scoring criteria, appeal rights, evaluator accountability, or protections against subjective judgments. Court interpretation is a highly complex profession performed in real time under constantly changing conditions. Unlike a controlled testing environment, interpreters routinely work through background noise, overlapping speakers, poor acoustics, low-volume speakers, rapid speech, trailing words, incomplete sentences, regional accents, emotional testimony, legal terminology, terms of art, and unexpected subject matter. Judges, attorneys, witnesses, and litigants often speak at speeds significantly faster than normal conversational speech. Interpreters frequently raise concerns regarding these communication barriers and environmental impediments, yet those concerns are not always addressed before interpretation continues. Even highly skilled interpreters may occasionally encounter unfamiliar terminology, momentary wordretrieval	when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish

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			difficulties, or difficult speech patterns. These realities are inherent in court interpretation and do not necessarily indicate incompetence. The proposal does not adequately explain how evaluators will distinguish between genuine deficiencies in an interpreter's knowledge, skills, and abilities and isolated performance issues caused by difficult courtroom conditions. Mandatory Participation and Potential Discipline The proposal states that participation in the skills assessment process is mandatory and that failure to participate may lead to suspension and possible revocation proceedings. I am concerned that an interpreter could face disciplinary consequences based on a dispute regarding participation in the assessment process itself rather than proven misconduct or incompetence. Before such authority is granted, the Judicial Council should establish clear standards, appeal rights, review procedures, and safeguards to ensure fairness and consistency. Broad Expansion of Rule 2.890 Allegations The proposal also expands the potential use of allegations under California Rule of Court 2.890. Rule 2.890 covers broad areas of professional conduct including accuracy, impartiality, confidentiality, conflicts of interest, professional demeanor, and duties to the court. As written, a wide range of alleged conduct could potentially result in disciplinary letters, corrective actions, skills assessments, retesting requirements, and public disclosure before formal adjudication has occurred. Impact on Represented Employee Interpreters Many court interpreters are represented employees working under negotiated Memoranda of Understanding that contain disciplinary procedures, representation rights, grievance procedures, and due process protections. I am concerned that the proposed credential review process could be used to address issues that are already covered by existing disciplinary systems negotiated between courts and employee organizations. Credential review should not become an alternative pathway that bypasses established disciplinary procedures, union representation rights,	genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and

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			grievance procedures, or other protections contained in collective bargaining agreements. If implementation of these procedures affects represented employees, the Judicial Council and courts should ensure that applicable meet-and-confer obligations are satisfied and that negotiated labor protections are respected. Requested Revisions I respectfully request that the Judicial Council: 1. Remove the provision authorizing public posting of disciplinary letters that have not been adjudicated through a formal hearing process. 2. Establish clear, objective, validated, and transparent standards for skills assessments. 3. Provide meaningful appeal rights and independent review of assessment results. 4. Clarify how environmental and courtroom conditions will be considered when evaluating interpreter performance. 5. Ensure that credential review procedures do not circumvent negotiated disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. 6. Preserve full due process protections before disciplinary actions become public. Include Union Representation in the Development and Oversight Process. The Judicial Council should include representatives of the California Federation of Interpreters and other interpreter stakeholders in the development, implementation, and ongoing review of the skills assessment and credential review process. Conclusion Court interpreters play a critical role in protecting access to justice and meaningful participation in judicial proceedings. Any system designed to evaluate interpreter competence or impose discipline should be fair, transparent, objective, and respectful of both professional standards and due process rights. I respectfully urge the Judicial Council to revise SP26-04 before adoption. Thank you for your consideration.	areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). A skills assessment would not be required merely because a complaint is filed. It would be required only when the credential review process determines that an assessment is necessary to evaluate a legitimate concern regarding interpreting skills. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. No skills assessment or disciplinary action would be imposed without supporting evidence. Once an assessment is appropriately required, participation is necessary for the Judicial Council to determine whether further action, remediation, or no action is warranted. The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of

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				The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.
57.	Gladys Pineda Reyna California Certified Interpreter, English/Spanish; Los Angeles	AM	To the Judicial Council and Court Interpreters Advisory Panel: I am a California court interpreter and respectfully submit the following comments regarding SP26-04, Proposed Revisions to the California Court Interpreter Credential Review Procedures. I support maintaining high professional standards for court interpreters and believe that the public deserves qualified, ethical, and competent language access services. However, I have serious	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do

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			employee organizations. Credential review should not become an alternative pathway that bypasses established disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. If implementation of these procedures affects represented employees, the Judicial Council and courts should ensure that applicable meet-and-confer obligations are satisfied and that negotiated labor protections are respected. Requested Revisions: I respectfully request that the Judicial Council: 1. Remove the provision authorizing public posting of disciplinary letters that have not been adjudicated through a formal hearing process. 2. Establish clear, objective, validated, and transparent standards for skills assessments. 3. Provide meaningful appeal rights and independent review of assessment results. 4. Clarify how environmental and courtroom conditions will be considered when evaluating interpreter performance. 5. Ensure that credential review procedures do not circumvent negotiated disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. 6. Preserve full due process protections before disciplinary actions become public. 7. Include Union Representation in the Development and Oversight Process. The Judicial Council should include representatives of the California Federation of Interpreters and other interpreter stakeholders in the development, implementation, and ongoing review of the skills assessment and credential review process. Conclusion: Court interpreters play a critical role in protecting access to justice and meaningful participation in judicial proceedings. Any system designed to evaluate interpreter competence or impose discipline should be fair, transparent, objective, and respectful of both professional standards and due process rights. I respectfully urge the Judicial Council to revise SP26-04 before adoption. Thank you for your consideration.	evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). A skills assessment would not be required merely because a complaint is filed. It would be required only when the credential review process determines that an assessment is necessary to evaluate a legitimate concern regarding interpreting skills. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. No skills assessment or disciplinary action would be imposed without supporting evidence. Once an assessment is appropriately required, participation is necessary for the Judicial Council to determine whether further action, remediation, or no action is warranted. The proposal does not expand the substantive professional standards

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				applicable employment processes or protections. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.
58.	Ramona Rodriguez California Certified/Registered Court Interpreter, Spanish; Garden Grove	AM	To the Judicial Council and Court Interpreters Advisory Panel: Good morning, I am a California court interpreter and respectfully submit the following comments regarding SP26-04, Proposed Revisions to the California Court Interpreter Credential Review Procedures. I support	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an

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			maintaining high professional standards for court interpreters and believe that the public deserves qualified, ethical, and competent language access services. However, I have serious concerns regarding several aspects of the proposed changes. Public Disciplinary Letters Without Formal Due Process The proposal authorizes the Court Interpreters Program (CIP) to issue disciplinary letters and publicly post the subject and terms of those letters on an interpreter's Master List record. This is concerning because a disciplinary letter could become part of an interpreter's permanent public professional record without a hearing before the Office of Administrative Hearings, without findings by an Administrative Law Judge, and without the procedural protections traditionally associated with formal discipline. A public disciplinary posting can affect an interpreter's professional reputation, future employment opportunities, and standing within the profession. Such consequences should not occur without full due process protections and independent review. Unclear Standards for Skills Assessments The proposal creates a mandatory skills assessment process but does not clearly identify the standards by which interpreters will be evaluated. California's credentialing system already establishes the qualifications necessary to become a certified or registered court interpreter. The proposal appears to create a new layer of evaluation without clearly identifying the performance standard, scoring criteria, appeal rights, evaluator accountability, or protections against subjective judgments. Court interpretation is a highly complex profession performed in real time under constantly changing conditions. Unlike a controlled testing environment, interpreters routinely work through background noise, overlapping speakers, poor acoustics, low-volume speakers, rapid speech, trailing words, incomplete sentences, regional accents, emotional testimony, legal terminology, terms of art, and unexpected subject matter. Judges, attorneys, witnesses, and litigants often speak at speeds significantly faster than normal	intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification

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			conversational speech. Interpreters frequently raise concerns regarding these communication barriers and environmental impediments, yet those concerns are not always addressed before interpretation continues. Even highly skilled interpreters may occasionally encounter unfamiliar terminology, momentary wordretrieval difficulties, or difficult speech patterns. These realities are inherent in court interpretation and do not necessarily indicate incompetence. The proposal does not adequately explain how evaluators will distinguish between genuine deficiencies in an interpreter's knowledge, skills, and abilities and isolated performance issues caused by difficult courtroom conditions. Mandatory Participation and Potential Discipline The proposal states that participation in the skills assessment process is mandatory and that failure to participate may lead to suspension and possible revocation proceedings. I am concerned that an interpreter could face disciplinary consequences based on a dispute regarding participation in the assessment process itself rather than proven misconduct or incompetence. Before such authority is granted, the Judicial Council should establish clear standards, appeal rights, review procedures, and safeguards to ensure fairness and consistency. Broad Expansion of Rule 2.890 Allegations The proposal also expands the potential use of allegations under California Rule of Court 2.890. Rule 2.890 covers broad areas of professional conduct including accuracy, impartiality, confidentiality, conflicts of interest, professional demeanor, and duties to the court. As written, a wide range of alleged conduct could potentially result in disciplinary letters, corrective actions, skills assessments, retesting requirements, and public disclosure before formal adjudication has occurred. Impact on Represented Employee Interpreters Many court interpreters are represented employees working under negotiated Memoranda of Understanding that contain disciplinary procedures, representation rights, grievance procedures, and due process protections. I am concerned that the	examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to

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			proposed credential review process could be used to address issues that are already covered by existing disciplinary systems negotiated between courts and employee organizations. Credential review should not become an alternative pathway that bypasses established disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. If implementation of these procedures affects represented employees, the Judicial Council and courts should ensure that applicable meet-and-confer obligations are satisfied and that negotiated labor protections are respected. Requested Revisions I respectfully request that the Judicial Council: 1. Remove the provision authorizing public posting of disciplinary letters that have not been adjudicated through a formal hearing process. 2. Establish clear, objective, validated, and transparent standards for skills assessments. 3. Provide meaningful appeal rights and independent review of assessment results. 4. Clarify how environmental and courtroom conditions will be considered when evaluating interpreter performance. 5. Ensure that credential review procedures do not circumvent negotiated disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. 6. Preserve full due process protections before disciplinary actions become public. Include Union Representation in the Development and Oversight Process. The Judicial Council should include representatives of the California Federation of Interpreters and other interpreter stakeholders in the development, implementation, and ongoing review of the skills assessment and credential review process. Conclusion Court interpreters play a critical role in protecting access to justice and meaningful participation in judicial proceedings. Any system designed to evaluate interpreter competence or impose discipline should be fair, transparent, objective, and respectful of both professional standards and due process rights. I respectfully urge the	reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). A skills assessment would not be required merely because a complaint is filed. It would be required only when the credential review process determines that an assessment is necessary to evaluate a legitimate concern regarding interpreting skills. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. No skills assessment or disciplinary action would be imposed without supporting evidence. Once an assessment is appropriately required, participation is necessary for the Judicial Council to determine whether further action, remediation, or no action is warranted.

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			Judicial Council to revise SP26-04 before adoption. Thank you for your consideration.	The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. Credential review and trial court employment discipline serve distinct, though sometimes related, purposes. Trial courts remain responsible for addressing employment matters, including any applicable collective bargaining, representation, grievance, and due process requirements. These actions are focused on an interpreter's employment with the trial court. In contrast, the Judicial Council's credential review process is focused specifically on an interpreter's statewide credential and its responsibility to maintain the integrity of that credential. While the same conduct may give rise to both employment-related and credentialing concerns, each process addresses a different interest and operates within

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				its respective authority. The credential review process is not intended to replace, duplicate, or circumvent applicable employment processes or protections. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.

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59.	Max Acosta Rubio California Certified Court Interpreter	N	Dear Justice Sanchez, Ms. Romero, Mr. Mata, and Members of the Court Interpreters Advisory Panel: I am submitting comments in opposition to SP26-04, Court Interpreters: Revised Credential Review Procedures, in its present form. I support legitimate efforts to improve interpreter competence and protect court users. However, this proposal is poorly conceived, procedurally unfair, and dangerously unbalanced. Its effect is draconian, and significant parts of its procedure are almost Kafkaesque: the same government program may receive the complaint, decide whether it is credible, select and pay the evaluators, control the evidence, interpret the assessment, impose corrective requirements, and publicly brand the interpreter—all before the interpreter receives a neutral hearing. That is not a fair credential-review system. It is an administrative punishment system with due process postponed until after much of the professional damage may already have occurred. 1. Public discipline may be imposed without a hearing The proposal authorizes CIP to issue a disciplinary letter before filing a charging document. That letter may require an interpreter to complete training, undergo assessment, take courses, or retake credentialing examinations "to remain in good standing." The proposal then requires that the subject and terms of the letter be posted on the interpreter's public Master List entry. A publicly posted letter that imposes mandatory conditions on an interpreter's credential is not merely "corrective." It is professional discipline. It can damage employment, assignments, contractual relationships, and reputation. Yet the proposal does not clearly guarantee the interpreter: A hearing before issuance; Access to all evidence; The right to challenge witnesses and evaluators; A neutral decision-maker; An appeal from the letter; A stay of publication while it is challenged; or Removal of the posting after remediation or exoneration. The proposal effectively permits punishment first and adjudication later—if adjudication is available at all. No disciplinary letter should be publicly posted or made mandatory unless the	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the

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			interpreter voluntarily accepts it as part of a settlement or it is sustained after formal charges and a hearing. 2. The supposedly "diagnostic" assessment is plainly punitive The proposal claims the skills assessment is not pass/fail and is intended to identify areas for improvement. That description is misleading. Assessment results may lead to mandatory training, repeated assessments, compulsory examinations, suspension, credential forfeiture, or revocation. Refusal to participate may itself become grounds for suspension. A process carrying those consequences is a high-stakes disciplinary examination, regardless of what label is attached to it. The proposal should not call the assessment merely diagnostic while using it as evidence for sanctions. Either it is confidential and remedial, or it is disciplinary and must include full procedural protections. 3. The standard for ordering an assessment is vague The proposal uses inconsistent phrases such as: Competence being "at issue"; Allegations that "question" competence; "Substantiated complaints"; "Substantial evidence"; "Substantive deficiency"; and Probable cause. These terms establish different thresholds and are not defined. As drafted, virtually any complaint questioning an interpreter's performance could trigger a compulsory assessment. There is no clear requirement that CIP first examine courtroom recordings, transcripts, witness credibility, equipment failures, speaker speed, dialect, overlapping speech, or other circumstances surrounding the alleged incident. Before ordering an assessment, CIP should be required to provide the complete complaint and evidence, identify the specific alleged errors, allow a written response, and make a documented preliminary finding supported by credible evidence. 4. A simulated test cannot prove what happened in court The proposed assessment uses prepared recordings and simulated scenarios. That may provide information about an interpreter's present performance, but it cannot establish whether the interpreter made a particular error during an earlier court proceeding. An interpreter might	hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to

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			perform poorly on a later simulation despite having interpreted the original proceeding correctly. The reverse is also possible. A simulated assessment should never substitute for evidence of the alleged incident. It should not be used as the sole basis for public discipline, suspension, or revocation. 5. The interpreter is not guaranteed the evidence needed to defend against the assessment The proposal says the results will be shared with the interpreter but does not guarantee timely access to: The complete assessment recording; Source scripts and recordings; The scoring rubric; Individual evaluator scores; Evaluator notes and comments; The evaluators' identities and qualifications; Communications between CIP and the evaluators; or The technical basis for terms such as "substantive deficiency." A summary prepared by CIP is not enough. The interpreter must receive the complete assessment record before any adverse action or disclosure to an employer court. The interpreter should also have the right to obtain an independent expert evaluation and challenge scoring errors, administration problems, bias, or evaluator conflicts. 6. Evaluator "neutrality" is not adequately protected The proposal repeatedly calls the evaluators neutral, but they are selected and paid by the Judicial Council. Merely describing evaluators as neutral does not make them independent. The procedures contain no adequate rules addressing: Conflicts of interest; Prior relationships with CIP, the court, or the interpreter; Competition with the interpreter for assignments; Challenges or recusals; Independent scoring; Disagreement between evaluators; or Review by a third evaluator. At least two evaluators should score independently. Significant disagreement should require a third evaluation. Qualifications, conflicts, scores, and comments should be disclosed to the interpreter. 7. Refusal or inability to participate may result in indefinite suspension The proposal permits an interpreter to be suspended for failing to participate until a decision regarding revocation is reached. No deadline is given for that decision. No prompt	evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). A skills assessment would not be required merely because a complaint is filed. It would be required only when the credential review process determines that an assessment is necessary to evaluate a legitimate concern regarding interpreting skills. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. No skills assessment or disciplinary action would be imposed

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			hearing is guaranteed. The proposal does not adequately distinguish refusal from inability caused by illness, disability, technology failure, scheduling conflicts, emergencies, or the need to obtain counsel. This is one of the proposal's most draconian features. An interpreter could lose the ability to work for an undefined period without a prior finding of incompetence. Any interim suspension should require specific evidence of an immediate and substantial risk, written findings, prompt formal charges, and an expedited hearing. 8. Public disclosure is disproportionate and potentially irreversible Publication on the Master List is not a minor administrative act. Courts, employers, agencies, attorneys, and the public may treat the posting as proof of incompetence or misconduct. The proposal provides no clear limit on how long the posting remains, no expungement procedure, no correction process, and no protection against publication while the interpreter disputes the allegations. Even if the interpreter is later cleared, reputational and financial damage may be permanent. Public disclosure should occur only after a final adjudicated decision or voluntary settlement. Notices should be time-limited and removed after successful remediation unless the misconduct was exceptionally serious. 9. The proposal mixes credential discipline with ordinary employment disputes The proposed subjects of disciplinary letters include tardiness, absenteeism, failure to prepare, inappropriate behavior, and failure to follow court procedures. Many of these are personnel, scheduling, contractual, or labor matters—not evidence that an interpreter lacks the competence or integrity required to hold a statewide credential. The proposal risks subjecting interpreters to both local employment discipline and statewide credential punishment for the same conduct. Credential review should be limited to conduct materially affecting professional fitness, competence, or ethical integrity. 10. Spanish interpreters would be placed under a different disciplinary system The skills assessment will	without supporting evidence. Once an assessment is appropriately required, participation is necessary for the Judicial Council to determine whether further action, remediation, or no action is warranted. The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. Credential review and trial court employment discipline serve distinct, though sometimes related, purposes. Trial courts remain responsible for addressing employment matters, including any applicable collective bargaining, representation, grievance, and due process requirements. These actions are focused on an interpreter's employment with the trial court. In contrast, the Judicial Council's credential review process is focused specifically on an interpreter's statewide credential and its

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			initially be available only for Spanish interpreters. Spanish interpreters would therefore face compulsory assessment and potential discipline under a system that does not yet exist for interpreters in other languages. That raises serious concerns about unequal enforcement and the use of one group as the test population for an unproven disciplinary mechanism. If Spanish is used for a pilot program, the pilot should remain confidential and remedial until reliability, evaluator consistency, error rates, bias, appeals, and outcomes have been independently evaluated. 11. The proposal lacks firm deadlines for CIP Interpreters face strict response deadlines, but CIP is given no meaningful deadline for completing investigations, administering assessments, sharing results, deciding whether to file charges, or resolving reinstatement. An unresolved investigation can itself damage an interpreter's career. The procedures should require firm deadlines, regular status notices, and dismissal when CIP cannot demonstrate good cause for excessive delay. 12. The proposal admits that no alternatives were considered Perhaps the clearest indication that SP26-04 is poorly conceived is its statement that "No alternatives were considered." That admission is extraordinary given the consequences involved. Reasonable alternatives include confidential advisory letters, voluntary remediation, mentoring, independent review panels, assessment limited to the mode actually questioned, and a confidential pilot before public disciplinary use. A system capable of suspending credentials and publicly damaging careers should not be adopted without examining less restrictive alternatives. Responses to the panel's questions Does the proposal appropriately address its stated purpose? No. It expands administrative power without creating equivalent protections against mistaken, retaliatory, inconsistent, or disproportionate discipline. Are the skills-assessment procedures clear and appropriate? No. The referral threshold, scoring standards, evaluator safeguards, disclosure rights, accommodations, review process, and	responsibility to maintain the integrity of that credential. While the same conduct may give rise to both employment-related and credentialing concerns, each process addresses a different interest and operates within its respective authority. The credential review process is not intended to replace, duplicate, or circumvent applicable employment processes or protections. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections.

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			appeal rights are inadequately defined. Is the disciplinary letter proportionate? Not as proposed. A confidential, voluntary corrective letter could be proportionate. A mandatory and publicly posted disciplinary letter issued without a hearing is not. Are the public-disclosure provisions appropriate? No. Public disclosure before final adjudication is fundamentally unfair and may cause irreversible professional damage. Requested action I respectfully request that SP26-04 not be adopted as written. At minimum, any revision should provide that: 1. No mandatory or public discipline occurs without formal notice, access to evidence, a neutral hearing, and appeal rights. 2. Confidential remedial resolutions are voluntary and nonprecedential. 3. The complete assessment record is provided to the interpreter. 4. Assessment standards, rubrics, validation data, and evaluator qualifications are published. 5. Interpreters may challenge evaluators, scoring, technical failures, and conflicts. 6. Assessment results are not disclosed to employers before review or adjudication. 7. Suspension requires compelling evidence and a prompt hearing. 8. Public postings are stayed during appeal, time-limited, and subject to correction and expungement. 9. Credential review is kept separate from ordinary workplace discipline. 10. The assessment program is tested confidentially before being used to punish interpreters. Court interpreters should be held accountable for genuine incompetence and serious misconduct. But accountability without due process becomes arbitrary power. The courts demand accuracy, neutrality, and fairness from interpreters. Interpreters are entitled to the same accuracy, neutrality, and fairness from the system judging them.	The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined. All submissions made through the credential review process are treated as confidential in accordance with the Credential Review Procedures and applicable requirements. To further support the integrity of the process and encourage good-faith participation, CIP will add narrowly tailored language clarifying that retaliation against individuals for good-faith participation in the credential review process is prohibited, subject to applicable law and Judicial Council authority. **Recommended draft location**: Section G or a general procedural-protections provision.
60.	Patrick Castro Salazar California Certified/Registered Court Interpreter, Spanish/English; Alhambra	AM	To the Judicial Council and Court Interpreters Advisory Panel: I, Patrick Castro Salazar, am a California court interpreter and respectfully submit the following comments regarding SP26-04, Proposed Revisions to the California Court Interpreter Credential Review Procedures. I support maintaining high professional standards for court	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option

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			interpreters and believe that the public deserves qualified, ethical, and competent language access services. However, I have serious concerns regarding several aspects of the proposed changes. Public Disciplinary Letters Without Formal Due Process The proposal authorizes the Court Interpreters Program (CIP) to issue disciplinary letters and publicly post the subject and terms of those letters on an interpreter's Master List record. This is concerning because a disciplinary letter could become part of an interpreter's permanent public professional record without a hearing before the Office of Administrative Hearings, without findings by an Administrative Law Judge, and without the procedural protections traditionally associated with formal discipline. A public disciplinary posting can affect an interpreter's professional reputation, future employment opportunities, and standing within the profession. Such consequences should not occur without full due process protections and independent review. Unclear Standards for Skills Assessments The proposal creates a mandatory skills assessment process but does not clearly identify the standards by which interpreters will be evaluated. California's credentialing system already establishes the qualifications necessary to become a certified or registered court interpreter. The proposal appears to create a new layer of evaluation without clearly identifying the performance standard, scoring criteria, appeal rights, evaluator accountability, or protections against subjective judgments. Court interpretation is a highly complex profession performed in real time under constantly changing conditions. Unlike a controlled testing environment, interpreters routinely work through background noise, overlapping speakers, poor acoustics, low-volume speakers, rapid speech, trailing words, incomplete sentences, regional accents, emotional testimony, legal terminology, terms of art, and unexpected subject matter. Judges, attorneys, witnesses, and litigants often speak at speeds significantly faster than normal conversational speech. Interpreters frequently raise	for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an

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			concerns regarding these communication barriers and environmental impediments, yet those concerns are not always addressed before interpretation continues. Even highly skilled interpreters may occasionally encounter unfamiliar terminology, momentary wordretrieval difficulties, or difficult speech patterns. These realities are inherent in court interpretation and do not necessarily indicate incompetence. The proposal does not adequately explain how evaluators will distinguish between genuine deficiencies in an interpreter's knowledge, skills, and abilities and isolated performance issues caused by difficult courtroom conditions. Mandatory Participation and Potential Discipline The proposal states that participation in the skills assessment process is mandatory and that failure to participate may lead to suspension and possible revocation proceedings. I am concerned that an interpreter could face disciplinary consequences based on a dispute regarding participation in the assessment process itself rather than proven misconduct or incompetence. Before such authority is granted, the Judicial Council should establish clear standards, appeal rights, review procedures, and safeguards to ensure fairness and consistency. Broad Expansion of Rule 2.890 Allegations The proposal also expands the potential use of allegations under California Rule of Court 2.890. Rule 2.890 covers broad areas of professional conduct including accuracy, impartiality, confidentiality, conflicts of interest, professional demeanor, and duties to the court. As written, a wide range of alleged conduct could potentially result in disciplinary letters, corrective actions, skills assessments, retesting requirements, and public disclosure before formal adjudication has occurred. Impact on Represented Employee Interpreters Many court interpreters are represented employees working under negotiated Memoranda of Understanding that contain disciplinary procedures, representation rights, grievance procedures, and due process protections. I am concerned that the proposed credential review process could be used to	objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The

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			address issues that are already covered by existing disciplinary systems negotiated between courts and employee organizations. Credential review should not become an alternative pathway that bypasses established disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. If implementation of these procedures affects represented employees, the Judicial Council and courts should ensure that applicable meet-and-confer obligations are satisfied and that negotiated labor protections are respected. Requested Revisions I respectfully request that the Judicial Council: 1. Remove the provision authorizing public posting of disciplinary letters that have not been adjudicated through a formal hearing process. 2. Establish clear, objective, validated, and transparent standards for skills assessments. 3. Provide meaningful appeal rights and independent review of assessment results. 4. Clarify how environmental and courtroom conditions will be considered when evaluating interpreter performance. 5. Ensure that credential review procedures do not circumvent negotiated disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. 6. Preserve full due process protections before disciplinary actions become public. Include Union Representation in the Development and Oversight Process. The Judicial Council should include representatives of the California Federation of Interpreters and other interpreter stakeholders in the development, implementation, and ongoing review of the skills assessment and credential review process. Conclusion Court interpreters play a critical role in protecting access to justice and meaningful participation in judicial proceedings. Any system designed to evaluate interpreter competence or impose discipline should be fair, transparent, objective, and respectful of both professional standards and due process rights. I respectfully urge the	assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). A skills assessment would not be required merely because a complaint is filed. It would be required only when the credential review process determines that an assessment is necessary to evaluate a legitimate concern regarding interpreting skills. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. No skills assessment or disciplinary action would be imposed without supporting evidence. Once an assessment is appropriately required, participation is necessary for the Judicial Council to determine whether further action, remediation, or no action is warranted.

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			Judicial Council to revise SP26-04 before adoption. Thank you for your consideration.	The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. Credential review and trial court employment discipline serve distinct, though sometimes related, purposes. Trial courts remain responsible for addressing employment matters, including any applicable collective bargaining, representation, grievance, and due process requirements. These actions are focused on an interpreter's employment with the trial court. In contrast, the Judicial Council's credential review process is focused specifically on an interpreter's statewide credential and its responsibility to maintain the integrity of that credential. While the same conduct may give rise to both employment-related and credentialing concerns, each process addresses a different interest and operates within its respective authority. The credential

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				review process is not intended to replace, duplicate, or circumvent applicable employment processes or protections. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.
61.	Aline Saylor Certified Court Interpreter	AM	To the Judicial Council and Court Interpreters Advisory Panel: I am a California court interpreter and respectfully submit the following comments regarding SP26-04,	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential

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			Proposed Revisions to the California Court Interpreter Credential Review Procedures. I support maintaining high professional standards for court interpreters and believe that the public deserves qualified, ethical, and competent language access services. However, I have serious concerns regarding several aspects of the proposed changes. Public Disciplinary Letters Without Formal Due Process The proposal authorizes the Court Interpreters Program (CIP) to issue disciplinary letters and publicly post the subject and terms of those letters on an interpreter's Master List record. This is concerning because a disciplinary letter could become part of an interpreter's permanent public professional record without a hearing before the Office of Administrative Hearings, without findings by an Administrative Law Judge, and without the procedural protections traditionally associated with formal discipline. A public disciplinary posting can affect an interpreter's professional reputation, future employment opportunities, and standing within the profession. Such consequences should not occur without full due process protections and independent review. Unclear Standards for Skills Assessments The proposal creates a mandatory skills assessment process but does not clearly identify the standards by which interpreters will be evaluated. California's credentialing system already establishes the qualifications necessary to become a certified or registered court interpreter. The proposal appears to create a new layer of evaluation without clearly identifying the performance standard, scoring criteria, appeal rights, evaluator accountability, or protections against subjective judgments. Court interpretation is a highly complex profession performed in real time under constantly changing conditions. Unlike a controlled testing environment, interpreters routinely work through background noise, overlapping speakers, poor acoustics, low-volume speakers, rapid speech, trailing words, incomplete sentences, regional accents, emotional testimony, legal terminology, terms of art, and unexpected	review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter.

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			subject matter. Judges, attorneys, witnesses, and litigants often speak at speeds significantly faster than normal conversational speech. Interpreters frequently raise concerns regarding these communication barriers and environmental impediments, yet those concerns are not always addressed before interpretation continues. Even highly skilled interpreters may occasionally encounter unfamiliar terminology, momentary word-retrieval difficulties, or difficult speech patterns. These realities are inherent in court interpretation and do not necessarily indicate incompetence. The proposal does not adequately explain how evaluators will distinguish between genuine deficiencies in an interpreter's knowledge, skills, and abilities and isolated performance issues caused by difficult courtroom conditions. Mandatory Participation and Potential Discipline The proposal states that participation in the skills assessment process is mandatory and that failure to participate may lead to suspension and possible revocation proceedings. I am concerned that an interpreter could face disciplinary consequences based on a dispute regarding participation in the assessment process itself rather than proven misconduct or incompetence. Before such authority is granted, the Judicial Council should establish clear standards, appeal rights, review procedures, and safeguards to ensure fairness and consistency. Broad Expansion of Rule 2.890 Allegations The proposal also expands the potential use of allegations under California Rule of Court 2.890. Rule 2.890 covers broad areas of professional conduct including accuracy, impartiality, confidentiality, conflicts of interest, professional demeanor, and duties to the court. As written, a wide range of alleged conduct could potentially result in disciplinary letters, corrective actions, skills assessments, retesting requirements, and public disclosure before formal adjudication has occurred. Requested Revisions I respectfully request that the Judicial Council: 1 Remove the provision authorizing public posting of disciplinary letters that have not been adjudicated through a formal	The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process.

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			hearing process. 2 Establish clear, objective, validated, and transparent standards for skills assessments. 3 Provide meaningful appeal rights and independent review of assessment results. 4 Clarify how environmental and courtroom conditions will be considered when evaluating interpreter performance. 5 Ensure that credential review procedures do not circumvent negotiated disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. 6 Preserve full due process protections before disciplinary actions become public. Include Union Representation in the Development and Oversight Process. The Judicial Council should include representatives of the California Federation of Interpreters and other interpreter stakeholders in the development, implementation, and ongoing review of the skills assessment and credential review process. Conclusion Court interpreters play a critical role in protecting access to justice and meaningful participation in judicial proceedings. Any system designed to evaluate interpreter competence or impose discipline should be fair, transparent, objective, and respectful of both professional standards and due process rights. I respectfully urge the Judicial Council to revise SP26-04 before adoption. Thank you for your consideration.	The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). A skills assessment would not be required merely because a complaint is filed. It would be required only when the credential review process determines that an assessment is necessary to evaluate a legitimate concern regarding interpreting skills. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. No skills assessment or disciplinary action would be imposed without supporting evidence. Once an assessment is appropriately required,

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				participation is necessary for the Judicial Council to determine whether further action, remediation, or no action is warranted. The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. Credential review and trial court employment discipline serve distinct, though sometimes related, purposes. Trial courts remain responsible for addressing employment matters, including any applicable collective bargaining, representation, grievance, and due process requirements. These actions are focused on an interpreter's employment with the trial court. In contrast, the Judicial Council's credential review process is focused specifically on an interpreter's statewide credential and its responsibility to maintain the integrity of that credential. While the same

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				conduct may give rise to both employment-related and credentialing concerns, each process addresses a different interest and operates within its respective authority. The credential review process is not intended to replace, duplicate, or circumvent applicable employment processes or protections. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the

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				skills-assessment process is implemented, evaluated, and refined.
62.	Ana Sevilla	AM	Dear Members of the Judicial Council, Thank you for the opportunity to provide comments on the proposed Court Interpreter Complaint Procedures. I appreciate the Judicial Council's efforts to establish a process that promotes professionalism, accountability, and public confidence in California's court interpreter program. I respectfully submit the following comments for your consideration: First, complaints alleging interpreter misconduct should be supported by evidence whenever reasonably available. While the proposal encourages complainants to provide evidence, it does not require it. Requiring supporting documentation or other available evidence would help prevent complaints based solely on unsubstantiated allegations and would promote a fairer process for everyone involved. Second, when an interpreter is notified that a complaint has been accepted for review, the interpreter should receive not only a summary of the allegations but also the evidence supporting those allegations. Providing the supporting evidence at the beginning of the process would allow the interpreter to fully understand the complaint and prepare a meaningful response. Third, the proposal should expressly state that a complaint may be closed without disciplinary charges when there is insufficient evidence to support the allegations. Including this as a specific basis for dismissal would improve transparency and reinforce that disciplinary action should be based on adequate evidence. Fourth, the proposal should ensure that disciplinary standards are applied consistently to all credentialed interpreters. At present, the complaint process applies to interpreters in every credentialed language, while the skills assessment currently applies only to Spanish interpreters. A disciplinary system should be uniform and equitable across all credentialed languages. Finally, I encourage the Judicial Council to consider the broader issue of accountability for non-credentialed interpreters who continue to perform	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter

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			court interpreting services. Although I recognize that the Judicial Council's authority is limited to credentialed interpreters, the current system creates an imbalance. Credentialed interpreters devote significant time, effort, and financial resources to obtaining and maintaining their credentials, complete continuing education requirements, comply with ethical standards, and pay annual renewal fees. Meanwhile, individuals who perform court interpreting without a credential are not subject to a comparable system of oversight or discipline. This disparity weakens the value of credentialing and creates an unfair system in which those who comply with professional standards face greater accountability than those who do not. I respectfully request that the Judicial Council consider these recommendations before adopting the final complaint procedures. A disciplinary system should protect the public while also ensuring fairness, transparency, consistency, and due process for the professionals it regulates. Thank you for your time and consideration.	on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and

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				practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review

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				process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined. The committee appreciates the concern regarding equitable

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				application across all credentialed languages. The next draft will clarify that the same substantive threshold and procedural protections apply regardless of language and that the Judicial Council will make every effort to create a skills assessment process in every certified language as some are currently in development. The Credential Review Procedures apply specifically to California certified and registered court interpreters who hold a Judicial Council-issued credential and are included on the Judicial Council Master List. Accordingly, these procedures are intended to address matters that may affect an interpreter's credential and continued eligibility to maintain that credential. Oversight of non-credentialed or provisionally qualified interpreters falls outside the scope of the Credential Review Procedures and is governed by other applicable trial court policies, Judicial Council program requirements, and related standards or procedures.
63.	Gabriela Espinoza Siebach Certified Court Interpreter, Spanish	AM	To whom it may concern, In reponse to the Invitation to Comment (SP26-04) related to the Court Interpreters: Revised Credential Review Procedures, I submit the following comments: • Does the proposal appropriately address the stated purpose? There are opportunities for corrections that have not been addressed. For example, in relation to "Submitting a Request for Credential Review," evidence is to be provided only if available, but it should be a requirement of the complaint process. Additionally, all	The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish

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			information related to the complaint should be provided to the interpreter who is the subject of the request for credential review, including all evidence. Additionally, the Skills Assessment would only be available in Spanish for the time being, which does not appropriately address the stated purpose. • Are the procedures regarding participation in skills assessment clear and appropriate? While clear, the procedures cannot be	genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and

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64.	Maria Cecilia Skaggs California Certified Court Interpreter, Spanish; Bakersfield	AM	To the Judicial Council and Court Interpreters Advisory Panel: I am a California court interpreter and respectfully submit the following comments regarding SP26-04, Proposed Revisions to the California Court Interpreter Credential Review Procedures. I support maintaining high professional standards for court interpreters and believe that the public deserves qualified, ethical, and competent language access services. However, I have serious concerns regarding several aspects of the proposed changes. Public Disciplinary Letters Without Formal Due Process The proposal authorizes the Court Interpreters Program (CIP) to issue disciplinary letters and publicly post the subject and terms of those letters on an interpreter's Master List record. This is concerning because a disciplinary letter could become part of an interpreter's permanent public professional record without a hearing before the Office of Administrative Hearings, without findings by an Administrative Law Judge, and without the procedural protections traditionally associated with formal discipline. A public disciplinary posting can affect an interpreter's professional reputation, future employment opportunities, and standing within the profession. Such consequences should not occur without full due process protections and independent review. Unclear Standards for Skills Assessments The proposal creates a mandatory skills assessment process but does not clearly identify the	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made.

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			standards by which interpreters will be evaluated. California's credentialing system already establishes the qualifications necessary to become a certified or registered court interpreter. The proposal appears to create a new layer of evaluation without clearly identifying the performance standard, scoring criteria, appeal rights, evaluator accountability, or protections against subjective judgments. Court interpretation is a highly complex profession performed in real time under constantly changing conditions. Unlike a controlled testing environment, interpreters routinely work through background noise, overlapping speakers, poor acoustics, low-volume speakers, rapid speech, trailing words, incomplete sentences, regional accents, emotional testimony, legal terminology, terms of art, and unexpected subject matter. Judges, attorneys, witnesses, and litigants often speak at speeds significantly faster than normal conversational speech. Interpreters frequently raise concerns regarding these communication barriers and environmental impediments, yet th ose concerns are not always addressed before interpretation continues. Even highly skilled interpreters may occasionally encounter unfamiliar terminology, momentary word-retrieval difficulties, or difficult speech patterns. These realities are inherent in court interpretation and do not necessarily indicate incompetence. The proposal does not adequately explain how evaluators will distinguish between genuine deficiencies in an interpreter's knowledge, skills, and abilities and isolated performance issues caused by difficult courtroom conditions. Mandatory Participation and Potential Discipline The proposal states that participation in the skills assessment process is mandatory and that failure to participate may lead to suspension and possible revocation proceedings. I am concerned that an interpreter could face disciplinary consequences based on a dispute regarding participation in the assessment process itself rather than proven misconduct or incompetence. Before such authority is granted, the Judicial Council should	However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises

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			establish clear standards, appeal rights, review procedures, and safeguards to ensure fairness and consistency. Broad Expansion of Rule 2.890 Allegations The proposal also expands the potential use of allegations under California Rule of Court 2.890. Rule 2.890 covers broad areas of professional conduct including accuracy, impartiality, confidentiality, conflicts of interest, professional demeanor, and duties to the court. As written, a wide range of alleged conduct could potentially result in disciplinary letters, corrective actions, skills assessments, retesting requirements, and public disclosure before formal adjudication has occurred. Impact on Represented Employee Interpreters Many court interpreters are represented employees working under negotiated Memoranda of Understanding that contain disciplinary procedures, representation rights, grievance procedures, and due process protections. I am concerned that the proposed credential review process could be used to address issues that are already covered by existing disciplinary systems negotiated between courts and employee organizations. Credential review should not become an alterna tive pathway that bypasses established disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. If implementation of these procedures affects represented employees, the Judicial Council and courts should ensure that applicable meet-and-confer obligations are satisfied and that negotiated labor protections are respected. Requested Revisions I respectfully request that the Judicial Council: 1. Remove the provision authorizing public posting of disciplinary letters that have not been adjudicated through a formal hearing process. 2. Establish clear, objective, validated, and transparent standards for skills assessments. 3. Provide meaningful appeal rights and independent review of assessment results. 4. Clarify how environmental and courtroom conditions will be considered when evaluating interpreter performance. 5. Ensure that	concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH).

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			credential review procedures do not circumvent negotiated disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. 6. Preserve full due process protections before disciplinary actions become public. Include Union Representation in the Development and Oversight Process. The Judicial Council should include representatives of the California Federation of Interpreters and other interpreter stakeholders in the development, implementation, and ongoing review of the skills assessment and credential review process. Conclusion Court interpreters play a critical role in protecting access to justice and meaningful participation in judicial proceedings. Any system designed to evaluate interpreter competence or impose discipline should be fair, transparent, objective, and respectful of both professional standards and due process rights. I respectfully urge the Judicial Council to revise SP26-04 before adoption. Thank you for your consideration.	A skills assessment would not be required merely because a complaint is filed. It would be required only when the credential review process determines that an assessment is necessary to evaluate a legitimate concern regarding interpreting skills. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. No skills assessment or disciplinary action would be imposed without supporting evidence. Once an assessment is appropriately required, participation is necessary for the Judicial Council to determine whether further action, remediation, or no action is warranted. The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made.

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				Credential review and trial court employment discipline serve distinct, though sometimes related, purposes. Trial courts remain responsible for addressing employment matters, including any applicable collective bargaining, representation, grievance, and due process requirements. These actions are focused on an interpreter's employment with the trial court. In contrast, the Judicial Council's credential review process is focused specifically on an interpreter's statewide credential and its responsibility to maintain the integrity of that credential. While the same conduct may give rise to both employment-related and credentialing concerns, each process addresses a different interest and operates within its respective authority. The credential review process is not intended to replace, duplicate, or circumvent applicable employment processes or protections. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately

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				without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.
65.	Francine Stern California Certified Court Interpreter, ASL; Lake Balboa	AM	To the Judicial Council and Court Interpreters Advisory Panel: I am a California court interpreter and respectfully submit the following comments regarding SP26-04, Proposed Revisions to the California Court Interpreter Credential Review Procedures. I support maintaining high professional standards for court interpreters and believe that the public deserves qualified, ethical, and competent language access services. However, I have serious concerns regarding several aspects of the proposed changes. Public Disciplinary Letters Without Formal Due Process: The proposal authorizes the Court Interpreters Program (CIP) to issue disciplinary letters and publicly post the subject and terms of those letters on an interpreter's Master List record. This is concerning because a disciplinary letter could become part of an interpreter's permanent public professional record without a hearing before the Office of Administrative Hearings, without findings by an Administrative Law Judge, and without the procedural protections traditionally associated with formal	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not

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			discipline. A public disciplinary posting can affect an interpreter's professional reputation, future employment opportunities, and standing within the profession. Such consequences should not occur without full due process protections and independent review. Unclear Standards for Skills Assessments: The proposal creates a mandatory skills assessment process but does not clearly identify the standards by which interpreters will be evaluated. California's credentialing system already establishes the qualifications necessary to become a certified or registered court interpreter. The proposal appears to create a new layer of evaluation without clearly identifying the performance standard, scoring criteria, appeal rights, evaluator accountability, or protections against subjective judgments. Court interpretation is a highly complex profession performed in real time under constantly changing conditions. Unlike a controlled testing environment, interpreters routinely work through background noise, overlapping speakers, poor acoustics, low-volume speakers, rapid speech, trailing words, incomplete sentences, regional accents, emotional testimony, legal terminology, terms of art, and unexpected subject matter. Judges, attorneys, witnesses, and litigants often speak at speeds significantly faster than normal conversational speech. Interpreters frequently raise concerns regarding these communication barriers and environmental impediments, yet those concerns are not always addressed before interpretation continues. Even highly skilled interpreters may occasionally encounter unfamiliar terminology, momentary word-retrieval difficulties, or difficult speech patterns. These realities are inherent in court interpretation and do not necessarily indicate incompetence. The proposal does not adequately explain how evaluators will distinguish between genuine deficiencies in an interpreter's knowledge, skills, and abilities and isolated performance issues caused by difficult courtroom conditions. Mandatory Participation and Potential Discipline: The proposal states that participation	result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center

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			in the skills assessment process is mandatory and that failure to participate may lead to suspension and possible revocation proceedings. I am concerned that an interpreter could face disciplinary consequences based on a dispute regarding participation in the assessment process itself rather than proven misconduct or incompetence. Before such authority is granted, the Judicial Council should establish clear standards, appeal rights, review procedures, and safeguards to ensure fairness and consistency. Broad Expansion of Rule 2.890 Allegations: The proposal also expands the potential use of allegations under California Rule of Court 2.890. Rule 2.890 covers broad areas of professional conduct including accuracy, impartiality, confidentiality, conflicts of interest, professional demeanor, and duties to the court. As written, a wide range of alleged conduct could potentially result in disciplinary letters, corrective actions, skills assessments, retesting requirements, and public disclosure before formal adjudication has occurred. Impact on Represented Employee Interpreters: Many court interpreters are represented employees working under negotiated Memoranda of Understanding that contain disciplinary procedures, representation rights, grievance procedures, and due process protections. I am concerned that the proposed credential review process could be used to address issues that are already covered by existing disciplinary systems negotiated between courts and employee organizations. Credential review should not become an alternative pathway that bypasses established disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. If implementation of these procedures affects represented employees, the Judicial Council and courts should ensure that applicable meet-and-confer obligations are satisfied and that negotiated labor protections are respected. Requested Revisions: I respectfully request that the Judicial Council: 1. Remove the provision authorizing public posting of	for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are

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			disciplinary letters that have not been adjudicated through a formal hearing process. 2. Establish clear, objective, validated, and transparent standards for skills assessments. 3. Provide meaningful appeal rights and independent review of assessment results. 4. Clarify how environmental and courtroom conditions will be considered when evaluating interpreter performance. 5. Ensure that credential review procedures do not circumvent negotiated disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. 6. Preserve full due process protections before disciplinary actions become public. 7. Include Union Representation in the Development and Oversight Process. The Judicial Council should include representatives of the California Federation of Interpreters and other interpreter stakeholders in the development, implementation, and ongoing review of the skills assessment and credential review process. Conclusion: Court interpreters play a critical role in protecting access to justice and meaningful participation in judicial proceedings. Any system designed to evaluate interpreter competence or impose discipline should be fair, transparent, objective, and respectful of both professional standards and due process rights. I respectfully urge the Judicial Council to revise SP26-04 before adoption. Thank you for your consideration.	appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). A skills assessment would not be required merely because a complaint is filed. It would be required only when the credential review process determines that an assessment is necessary to evaluate a legitimate concern regarding interpreting skills. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. No skills assessment or disciplinary action would be imposed without supporting evidence. Once an assessment is appropriately required, participation is necessary for the Judicial Council to determine whether further action, remediation, or no action is warranted. The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with

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				notice of the concerns and an opportunity to respond before a determination is made. Credential review and trial court employment discipline serve distinct, though sometimes related, purposes. Trial courts remain responsible for addressing employment matters, including any applicable collective bargaining, representation, grievance, and due process requirements. These actions are focused on an interpreter's employment with the trial court. In contrast, the Judicial Council's credential review process is focused specifically on an interpreter's statewide credential and its responsibility to maintain the integrity of that credential. While the same conduct may give rise to both employment-related and credentialing concerns, each process addresses a different interest and operates within its respective authority. The credential review process is not intended to replace, duplicate, or circumvent applicable employment processes or protections. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important

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				intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.
66.	Michele Stevens California Certified Court Interpreter, Spanish; Calabasas	AM	To the Judicial Council and Court Interpreters Advisory Panel: I am a California court interpreter and respectfully submit the following comments regarding SP26-04, Proposed Revisions to the California Court Interpreter Credential Review Procedures. I support maintaining high professional standards for court interpreters and believe that the public deserves qualified, ethical, and competent language access services. However, I have serious concerns regarding several aspects of the proposed changes. Public Disciplinary Letters Without Formal Due Process The proposal authorizes the Court Interpreters Program (CIP) to issue disciplinary letters and publicly post the subject and terms of those letters on an interpreter's Master List record. This is concerning because a disciplinary letter could become part of an interpreter's permanent public professional record without a hearing	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct.

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			before the Office of Administrative Hearings, without findings by an Administrative Law Judge, and without the procedural protections traditionally associated with formal discipline. A public disciplinary posting can affect an interpreter's professional reputation, future employment opportunities, and standing within the profession. Such consequences should not occur without full due process protections and independent review. Unclear Standards for Skills Assessments The proposal creates a mandatory skills assessment process but does not clearly identify the standards by which interpreters will be evaluated. California's credentialing system already establishes the qualifications necessary to become a certified or registered court interpreter. The proposal appears to create a new layer of evaluation without clearly identifying the performance standard, scoring criteria, appeal rights, evaluator accountability, or protections against subjective judgments. Court interpretation is a highly complex profession performed in real time under constantly changing conditions. Unlike a controlled testing environment, interpreters routinely work through background noise, overlapping speakers, poor acoustics, low-volume speakers, rapid speech, trailing words, incomplete sentences, regional accents, emotional testimony, legal terminology, terms of art, and unexpected subject matter. Judges, attorneys, witnesses, and litigants often speak at speeds significantly faster than normal conversational speech. Interpreters frequently raise concerns regarding these communication barriers and environmental impediments, yet those concerns are not always addressed before interpretation continues. Even highly skilled interpreters may occasionally encounter unfamiliar terminology, momentary wordretrieval difficulties, or difficult speech patterns. These realities are inherent in court interpretation and do not necessarily indicate incompetence. The proposal does not adequately explain how evaluators will distinguish between genuine deficiencies in an interpreter's knowledge, skills, and	A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech,

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			abilities and isolated performance issues caused by difficult courtroom conditions. Mandatory Participation and Potential Discipline The proposal states that participation in the skills assessment process is mandatory and that failure to participate may lead to suspension and possible revocation proceedings. I am concerned that an interpreter could face disciplinary consequences based on a dispute regarding participation in the assessment process itself rather than proven misconduct or incompetence. Before such authority is granted, the Judicial Council should establish clear standards, appeal rights, review procedures, and safeguards to ensure fairness and consistency. Broad Expansion of Rule 2.890 Allegations The proposal also expands the potential use of allegations under California Rule of Court 2.890. Rule 2.890 covers broad areas of professional conduct including accuracy, impartiality, confidentiality, conflicts of interest, professional demeanor, and duties to the court. As written, a wide range of alleged conduct could potentially result in disciplinary letters, corrective actions, skills assessments, retesting requirements, and public disclosure before formal adjudication has occurred. Impact on Represented Employee Interpreters Many court interpreters are represented employees working under negotiated Memoranda of Understanding that contain disciplinary procedures, representation rights, grievance procedures, and due process protections. I am concerned that the proposed credential review process could be used to address issues that are already covered by existing disciplinary systems negotiated between courts and employee organizations. Credential review should not become an alternative pathway that bypasses established disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. If implementation of these procedures affects represented employees, the Judicial Council and courts should ensure that applicable meet-and-confer obligations are satisfied and that	poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine

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			negotiated labor protections are respected. Requested Revisions I respectfully request that the Judicial Council: 1. Remove the provision authorizing public posting of disciplinary letters that have not been adjudicated through a formal hearing process. 2. Establish clear, objective, validated, and transparent standards for skills assessments. 3. Provide meaningful appeal rights and independent review of assessment results. 4. Clarify how environmental and courtroom conditions will be considered when evaluating interpreter performance. 5. Ensure that credential review procedures do not circumvent negotiated disciplinary procedures, union representation rights, grievance procedures, or other protections contained in collective bargaining agreements. 6. Preserve full due process protections before disciplinary actions become public. Include Union Representation in the Development and Oversight Process. The Judicial Council should include representatives of the California Federation of Interpreters and other interpreter stakeholders in the development, implementation, and ongoing review of the skills assessment and credential review process. Conclusion Court interpreters play a critical role in protecting access to justice and meaningful participation in judicial proceedings. Any system designed to evaluate interpreter competence or impose discipline should be fair, transparent, objective, and respectful of both professional standards and due process rights. I respectfully urge the Judicial Council to revise SP26-04 before adoption. Thank you for your consideration.	whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). A skills assessment would not be required merely because a complaint is filed. It would be required only when the credential review process determines that an assessment is necessary to evaluate a legitimate concern regarding interpreting skills. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. No skills assessment or disciplinary action would be imposed without supporting evidence. Once an assessment is appropriately required, participation is necessary for the Judicial Council to determine whether further action, remediation, or no action is warranted. The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards is substantiated. An allegation alone

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				does not establish a violation or automatically result in discipline, corrective action, or a skills assessment. The credential review process provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. Credential review and trial court employment discipline serve distinct, though sometimes related, purposes. Trial courts remain responsible for addressing employment matters, including any applicable collective bargaining, representation, grievance, and due process requirements. These actions are focused on an interpreter's employment with the trial court. In contrast, the Judicial Council's credential review process is focused specifically on an interpreter's statewide credential and its responsibility to maintain the integrity of that credential. While the same conduct may give rise to both employment-related and credentialing concerns, each process addresses a different interest and operates within its respective authority. The credential review process is not intended to replace, duplicate, or circumvent applicable employment processes or protections. The Judicial Council appreciates the recommendations concerning procedural fairness, assessment

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				standards, environmental factors, review procedures, and represented employees. However, retaining disciplinary letters and skills assessments provides important intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.
67.	Phiho Stotelmyre Vietnamese Court Interpreter	N	I have concerns regarding the proposed use of third-party skills assessments as a basis for disciplinary action. First, any assessment of an interpreter's performance should be based on an accurate and complete record of what was actually said in both the source language and the target language. Without an audio recording of both the original utterance and the interpretation provided, a third-party evaluator may be forced to rely on second-hand accounts, summaries, or subjective impressions rather than verifiable evidence. This raises concerns about fairness, reliability, and due process. Second, the proposal does not sufficiently	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate

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			address the qualifications of the individuals conducting the skills assessments. Interpreting is a highly specialized profession. Before an evaluator's opinion can be relied upon for disciplinary purposes, there should be clear standards establishing the evaluator's competence and qualifications to assess interpreter performance. In addition, unlike a police officer's conduct, an interpreter's alleged error often involves a matter of linguistic judgment. Two highly qualified interpreters may reasonably disagree regarding word choice, register, regional usage, cultural nuance, syntax, or legal terminology. In many situations, there is no single "correct" interpretation. Without a recording of the original statement and the interpretation provided, it may be impossible to determine whether the interpreter's rendition was reasonable and professionally acceptable under the circumstances. I respectfully suggest that: (1) the Judicial Council consider implementing a recording system for interpreted proceedings, similar in concept to body-worn cameras used by law enforcement officers. Preserving both the source-language communication and the interpretation would provide an objective record for complaint investigations, protect court users, and protect interpreters from unfounded allegations; and (2) the Judicial Council consider reviewing its current certification and qualification process for court interpreters to determine whether any modifications are needed to ensure that interpreters entering the profession possess the skills necessary to meet the demands of courtroom interpreting. A recorded record would promote accuracy, transparency, accountability, and confidence in the complaint review process by ensuring that disciplinary decisions are based on objective evidence rather than subjective recollections.	when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish

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				genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and

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				intermediate options that allow the Judicial Council to address substantiated concerns proportionately without resorting unnecessarily to suspension or revocation proceedings. The Judicial Council agrees that credential review procedures should be fair, consistent, and appropriately protective of interpreters while also maintaining the integrity of the statewide credentialing program. The proposed revisions are intended to provide a more structured and proportionate process for addressing substantiated concerns while preserving appropriate procedural protections. The Judicial Council will continue to obtain input from court interpreters and other subject-matter experts as the skills-assessment process is implemented, evaluated, and refined.
68.	Stephanie Kuo Superior Court of California, County of Los Angeles	A	The following comments are representative of the Superior Court of California, County of Los Angeles (Court), and do not represent or promote the viewpoint of any particular officer or employee. In response to the Judicial Council of California's "ITC SP26-04 Court Interpreters: Revised Credential Review Procedures," the Court generally agrees with the proposal. The Court agrees that the California Court Interpreter Credential Review Procedures should be amended to provide guidance on addressing skills-based complaints. The Court requests further clarification and details of the proposal so it can understand what role and responsibilities trial courts have in the new process and with implementation. As the largest trial court in California, the Court employs a significant number of court interpreters. We recognize that the size and complexity of the Court's interpreter workforce create a unique	The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors.

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			perspective on this proposal, therefore, our answers and requests for clarification reflect that perspective. The Court believes it would be helpful if the proposal clarified that trial courts retain discretion to address complaints against employee interpreters locally and are not required to submit every complaint received to the Judicial Council for credential review. Clarifying that only complaints warranting potential credential action are expected to be referred would help distinguish local personnel matters from statewide credential review. Although the Judicial Council intends to expand assessments to additional languages as evaluators become available, it would be beneficial to describe how languages with limited evaluator availability will be addressed to promote consistency and fairness across interpreter classifications. The Court supports the concept of a corrective step short of formal charges. The Court requests outlining a process for notifying an interpreter's employer court when a disciplinary letter is issued. Timely notification would help employer courts manage staffing, coordinate performance expectations, and remain informed of statewide actions that may affect their employees. The proposal may create additional costs depending on the assessment process and availability of interpreters. If interpreters are unavailable during the assessment process, the Court may need to hire contractors for coverage. The proposal's effect on courts of varying sizes will depend on their court interpreter workforce.	From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential.

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				The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH).
69.	Superior Court organizational response (commenter not identified in submitted file)	AM	1. Does the proposal appropriately address the stated purpose? Response: Yes. The proposal appropriately addresses the stated purpose. Recommend brief implementation guidance clarifying the local court's role when a complaint involves a court-employed interpreter. 2. Are the procedures regarding participation in skills assessment clear and appropriate? Response: Yes. The proposed skills assessment process appears appropriate. 3. Does the disciplinary letter provide an effective and proportionate intermediate corrective option? Response: Yes. The disciplinary letter appears to provide an effective and proportionate intermediate corrective option without the need to initiate formal disciplinary proceedings and its intent is well-defined. 4. Are the proposed public disclosure provisions for the subject of disciplinary letters appropriate? Response: Yes, with clarification. Recommend that the final procedures clarify when disciplinary-letter information becomes final for posting, what information will be posted, how long it will remain public, how completion of corrective action will be reflected, and how courts will be notified. 5. Would the proposal provide cost savings? If so, please quantify. Response: The proposal appears neutral in providing cost savings. 6. What would the implementation requirements be for courts – for example, training staff (please identify position and expected hours of training), revising processes and procedures (please describe), changing docket codes in case management systems, or modifying case management systems? Response: N/A 7. Would two months from Judicial Council approval of this proposal until its effective date provide sufficient time for implementation? Response:	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter

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			Yes. Two months would be sufficient time for implementation. 8. How well would this proposal work in courts of different sizes? Response: The proposal would work for courts of different sizes because the credential-review process remains centralized through the Judicial Council Court Interpreters Program. However, Larger courts that serve diverse populations with a wide range of language needs may experience delays in receiving notification of the resolution of skill-based complaints involving languages	and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's knowledge, skills, and abilities (KSAs) when a complaint raises concerns regarding interpreting performance. The diagnostic tools are based on the established KSAs for court interpreters and were developed by NCSC subject-matter experts, including psychometricians and

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				experienced court interpreters. During development, the tools were reviewed by the Court Interpreters Advisory Panel (CIAP) in closed meetings and were tested using experienced and practicing court interpreters to evaluate and refine the assessment process. The skills assessment will be conducted virtually using prepared audio recordings, scripts, and interpreting scenarios designed to reflect typical court interactions. The assessment will be recorded and evaluated by a minimum of two evaluators using an approved scoring rubric. The assessment is intended to identify specific interpreting skills and areas that may require improvement. It is diagnostic rather than pass/fail and will not, by itself, determine whether an interpreter retains or loses a credential. The skills assessment may identify areas where improvement, training, or other remedial measures are appropriate and does not necessarily result in formal disciplinary action or referral to the Office of Administrative Hearings (OAH). The proposal does not expand the substantive professional standards contained in California Rule of Court 2.890. Rather, it provides additional procedures and a broader range of proportionate responses when an alleged violation of existing standards

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				skills-assessment process is implemented, evaluated, and refined. The committee appreciates the concern regarding equitable application across all credentialed languages. The next draft will clarify that the same substantive threshold and procedural protections apply regardless of language and that the Judicial Council will make every effort to create a skills assessment process in every certified language as some are currently in development.
70.	Anabella Tidona CA Court Certified Interpreter, Spanish; Santa Monica	AM	To the Judicial Council and Court Interpreters Advisory Panel: I am a California court interpreter and respectfully submit the following comments regarding SP26-04, Proposed Revisions to the California Court Interpreter Credential Review Procedures. I support maintaining high professional standards for court interpreters and believe that the public deserves qualified, ethical, and competent language access services. However, I have serious concerns regarding several aspects of the proposed changes. Public Disciplinary Letters Without Formal Due Process The proposal authorizes the Court Interpreters Program (CIP) to issue disciplinary letters and publicly post the subject and terms of those letters on an interpreter's Master List record. This is concerning because a disciplinary letter could become part of an interpreter's permanent public professional record without a hearing before the Office of Administrative Hearings, without findings by an Administrative Law Judge, and without the procedural protections traditionally associated with formal discipline. A public disciplinary posting can affect an interpreter's professional reputation, future employment opportunities, and standing within the profession. Such consequences should not occur without full due process protections and independent review. Unclear Standards for	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not result in disciplinary action. The credential review process also provides the interpreter with notice of the concerns and an opportunity to

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			Skills Assessments The proposal creates a mandatory skills assessment process but does not clearly identify the standards by which interpreters will be evaluated. California's credentialing system already establishes the qualifications necessary to become a certified or registered court interpreter. The proposal appears to create a new layer of evaluation without clearly identifying the performance standard, scoring criteria, appeal rights, evaluator accountability, or protections against subjective judgments. Court interpretation is a highly complex profession performed in real time under constantly changing conditions. Unlike a controlled testing environment, interpreters routinely work through background noise, overlapping speakers, poor acoustics, low-volume speakers, rapid speech, trailing words, incomplete sentences, regional accents, emotional testimony, legal terminology, terms of art, and unexpected subject matter. Judges, attorneys, witnesses, and litigants often speak at speeds significantly faster than normal conversational speech. Interpreters frequently raise concerns regarding these communication barriers and environmental impediments, yet those concerns are not always addressed before interpretation continues. Even highly skilled interpreters may occasionally encounter unfamiliar terminology, momentary word-retrieval difficulties, or difficult speech patterns. These realities are inherent in court interpretation and do not necessarily indicate incompetence. The proposal does not adequately explain how evaluators will distinguish between genuine deficiencies in an interpreter's knowledge, skills, and abilities and isolated performance issues caused by difficult courtroom conditions. Mandatory Participation and Potential Discipline The proposal states that participation in the skills assessment process is mandatory and that failure to participate may lead to suspension and possible revocation proceedings. I am concerned that an interpreter could face disciplinary consequences based on a dispute regarding participation in the assessment process itself	respond before a determination is made. However, to address concerns raised during public comment, the procedures have been revised to provide that an interpreter who is subject to a disciplinary letter may either (1) accept the disciplinary letter and forgo an OAH hearing, or (2) request that the matter be referred to OAH for review and determination. Depending on the severity of the matter, CIP may place the interpreter on suspended status pending the hearing and final resolution of the matter. The skills assessment does not establish a new credentialing standard or replace the certification examination. Rather, it provides an objective, standardized means of evaluating an interpreter's skills when a credential review identifies a substantiated performance concern. The process is intended to distinguish genuine skill deficiencies from isolated errors or performance issues attributable to courtroom conditions, such as rapid or overlapping speech, poor audio quality, or other environmental factors. From 2022 to 2025, the council contracted with the National Center for State Courts (NCSC) to support the development and refinement of diagnostic tools and related resources for assessing an interpreter's

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71.	Michelle Topete California Certified Court Interpreter, Spanish; Modesto	AM	To the Judicial Council and Court Interpreters Advisory Panel: I am a California court interpreter and respectfully submit the following comments regarding SP26-04, Proposed Revisions to the California Court Interpreter Credential Review Procedures. I support maintaining high professional standards for court interpreters and believe that the public deserves qualified, ethical, and competent language access services. However, I have serious concerns regarding several aspects of the proposed changes. Public Disciplinary Letters Without Formal Due Process The proposal authorizes the Court Interpreters Program (CIP) to issue disciplinary letters and publicly post the subject and terms of those letters on an interpreter's Master List record. This is concerning because a disciplinary letter could become part of an interpreter's permanent public professional record without a hearing before the Office of Administrative Hearings, without findings by an Administrative Law Judge, and without the procedural protections traditionally associated with formal	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct. A disciplinary letter does not suspend or revoke an interpreter's credential, and an allegation alone would not

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72.	Rosa Trevizo California Certified Court Interpreter, Spanish; Galt	AM	My name is Rosa Trevizo; I am a California court interpreter and respectfully submit the following comments regarding SP26-04, Proposed Revisions to the California Court Interpreter Credential Review Procedures. I support maintaining high professional standards for court interpreters and believe that the public deserves qualified, ethical, and competent language access services. However, I have serious concerns regarding several aspects of the proposed changes. Public Disciplinary Letters Without Formal Due Process The proposal authorizes the Court Interpreters Program (CIP) to issue disciplinary letters and publicly post the subject and terms of those letters on an interpreter's Master List record. This is concerning because a disciplinary letter could become part of an interpreter's permanent public professional record without a hearing before the Office of Administrative Hearings, without	The Court Interpreters Program (CIP) receives approximately 12 complaints each year through the credential review process. The proposed disciplinary letter provides an intermediate and proportionate option for addressing substantiated concerns that warrant disciplinary action but do not rise to the level of suspension or revocation. For example, a disciplinary letter may be appropriate when an interpreter receives a second substantiated complaint regarding unethical behavior after having previously been warned about similar conduct.

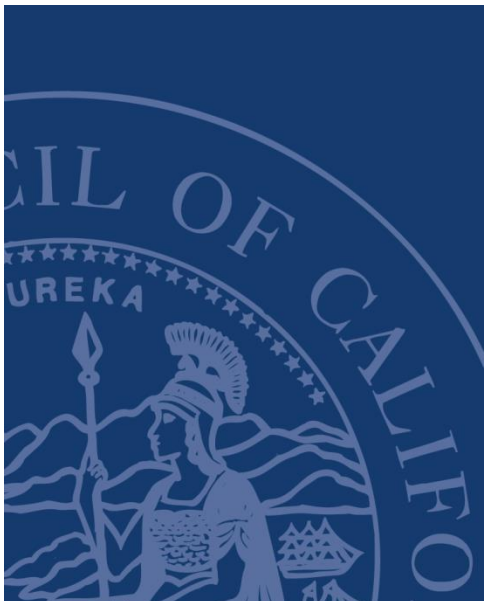
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California Court Interpreter Credential Review Procedures

EFFECTIVE JANUARY 1, 2020



JUDICIAL COUNCIL
OF CALIFORNIA

COURT INTERPRETERS
ADVISORY PANEL

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California Court Interpreter Credential Review Procedures

A. Purpose

Court interpreters play a critical role in facilitating accurate communications between the court and limited-English-proficient users. In performing that crucial function, court interpreters are governed by the professional conduct provisions of rule 2.890 of the California Rules of Court.[1] The Judicial Council of California adopts these credential review procedures in accordance with Government Code section 68562(d), which provides: "The Judicial Council shall adopt standards and requirements for interpreter proficiency, continuing education, certification renewal, and discipline. The Judicial Council shall adopt standards of professional conduct for court interpreters."

These procedures reinforce the professional standards for certified and registered court interpreters by:

1. Establishing a process for the Judicial Council under its authority to issue court interpreter credentials, and to review allegations of professional misconduct or malfeasance against certified and registered court interpreters;

2. Defining the due process protections and procedures governing the credential review process;

3. Seeing that California certified and registered court interpreters meet and maintain minimum professional standards of practice; and

4. Safeguarding the quality and integrity of credentialed court interpreters in California.

The procedures set forth recognize the distinction between the obligations of the Judicial Council as the credentialing body to ensure interpreters abide by the codes of professional conduct as set forth in rule 2.890, *Professional conduct for interpreters*, and those of the employer to ensure interpreter employees follow workplace policies. Trial courts retain the authority to enforce their local personnel policies, collective bargaining agreements, and contractual agreements with independent contract interpreters.

The credential review procedures do not preclude a superior court—consistent with the court's applicable memoranda of understanding, personnel policies, and/or local rules—from receiving and investigating complaints, conducting investigations, and taking the necessary disciplinary or corrective action against interpreter employees or contractors

[1] *Professional Standards and Ethics for California Court Interpreters*, published by the Judicial Council, is based on the principles and requirements set forth in rule 2.890 of the California Rules of Court. The manual is available at www.courts.ca.gov/documents/CIP-Ethics-Manual.pdf.

who violate a court's rules, policies, and procedures, but rather supplement local court actions.

The credential review procedures are separate from discipline arising from an interpreter's work performance. However, discipline or corrective actions at the court on an employee interpreter may be considered in the credential review process, or, in regard to actions taken on an independent interpreter's contractual agreement with the court as a result of an allegation of misconduct or ongoing performance issues.

B. Jurisdiction

Every certified or registered spoken-language interpreter on the Master List of Certified Court and Registered Interpreters (Master List) is subject to these procedures.[2] Jurisdiction over an interpreter to enforce and act under these procedures exists regardless of whether the interpreter resides in California.

C. Grounds for Sanctions on Interpreter Credentials

As the entity responsible for issuing credentials to court interpreters in California, the Judicial Council of California's Court Interpreters Program (CIP) may impose sanctions on any California court certified or registered interpreter, up to and including revocation of an interpreter's credential. The grounds for sanctions may include:

1. Violation of rule 2.890 of the California Rules of Court;

2. Gross incompetence;

3. Deliberate misrepresentation of a certified court or registered interpreter credential, including failure to notify relevant parties of a suspension or revocation of a court interpreter credential;

4. Knowing and reckless disclosure of confidential or privileged information obtained while serving in an official capacity;

5. Fraud, dishonesty, or corruption related to the functions and duties of a court interpreter;

6. Conviction of a felony or misdemeanor;

[2] American Sign Language interpreters are credentialed by the Registry of Interpreters for the Deaf (RID). Information about filing a request for review of an RID-certified interpreter is found at *www.rid.org/ethics/file-a-complaint/*.

7. Violation of California or federal law, including discrimination and harassment laws;

8. False or deceptive advertising after receipt of notification to discontinue; and

9. Violation of duties imposed by these procedures.

D. Statute of Limitations

Requests for a credential review of alleged misconduct as identified in section C, Grounds for Sanctions on Interpreter Credential, submitted to CIP by an individual or entity **other than a court** more than 90 days after the alleged misconduct occurs will be rejected as untimely, and no further action will be taken.

If a trial court receives a complaint that may require a credential review, the following time limits apply:

1. Requests for credential review submitted by anyone other than a trial court, or that regard an independent contractor, must be submitted to CIP within 90 days of the alleged misconduct.

2. As the employing entity, a court should locally investigate any allegation of employee misconduct. If the results of the investigation may warrant a sanction on the interpreter's credential, the court must submit a request for credential review within 30 days of the completion of the investigation; or

    a. If a court requires assistance in conducting an investigation and it is determined a credential review is required, the court must submit the request to CIP within 90 days of the date of the alleged misconduct; or

    b. If the 90-day period has elapsed, the court must submit the request for credential review to CIP within 30 days of becoming aware of the alleged misconduct, or after addressing an ongoing pattern of conduct that may require a sanction on a court interpreter's credential.

E. Submitting a Request for Credential Review

Any person or entity, including the court, may submit a request for a credential review to CIP regarding a spoken-language interpreter who is a California certified court or registered interpreter and enrolled on the Master List. The request for credential review:

1. Must be submitted using the complaint form, available on the "Court Interpreters Program" webpage of the California Courts website: *https://www.courts.ca.gov/42807.htm.*

2. Must be signed and dated under penalty of perjury. During the credential review process, the confidentiality of a complainant's identity will be preserved to the extent permitted by law.

3. The request for credential review must include a detailed description of the alleged misconduct including, if known or available, the date, time, location, name of interpreter, the interpreter's badge number, the case file number of the proceeding interpreted, the names and contact information of any potential witnesses, and any documents or evidence that support the allegations.

4. The request for credential review must be submitted to CIP, or to the local court where the allegation occurred. The request for credential review may be submitted in person or mailed to:

   Judicial Council of California
   Court Interpreters Program
   455 Golden Gate Avenue
   San Francisco, CA 94102-3688

   The complaint form requesting a credential review, along with supporting documentation, may also be submitted by e-mail to: credreview@jud.ca.gov.

F. Assessment of a Request for Credential Review

Within 30 days of receipt of the request for a credential review, CIP staff will assess the request for credential review and determine whether it is complete, meets jurisdictional requirements, and provides sufficient factual allegations that, if true, would constitute grounds for sanctions up to and including revocation of an interpreter's credential.

1. The complainant will be notified within 45 days of the receipt of the request for credential review informing the complainant that the request has been received and is being reviewed; or

2. The complainant may be asked to provide additional information for staff to assess the request for credential review. Supplemental information must be submitted within 30 days, or as directed by CIP staff.

3. CIP staff will notify the complainant of the action to be taken regarding the request for credential review, and:

    a. If the request for credential review meets the jurisdictional requirements, written notice will be provided to the interpreter who is the subject of the request for credential review. The notice will contain a summary of the allegation(s), the date the allegation(s) took place, and the case file number of the case interpreted, if available or applicable. The notice must be sent within 45 days of the receipt of the request for credential review by CIP staff; or

    b. Assessment of the request for credential review may be deferred if the allegations are related to pending civil or criminal litigation. CIP staff will notify the complainant and the subject interpreter of the deferral, the reasons for the deferral, and its anticipated duration, if known.

4. If the allegations in the request for credential review do not meet jurisdictional requirements that warrant sanctions on an interpreter's credential, the complainant will be notified within 45 days of the receipt of the request for credential review.

5. All requests for credential review and investigations are confidential, except when a final determination is made to impose the sanctions as provided in section L, Notification of Sanction on a Credential.

6. The final determination, including the grounds for the sanction(s) may be made accessible to the public consistent with the rules governing public disclosure and California Rules of Court, rule 10.500.

G. Investigation of Request for Credential Review and Issuance of Charging Document

1. The investigation may include, but is not limited to:

    a. Interviewing the complainant, interpreter, witnesses, and other relevant persons. If the interpreter chooses not to participate or respond to questions, the investigation may continue without the interpreter's participation.

    b. Reviewing records, documents, case files, and other materials.

    c. Requesting information and materials from the interpreter and other relevant persons. The interpreter must respond to all inquiries within 30 days of receipt of the request for information or materials unless CIP staff grants an extension upon a

showing of good cause. If the interpreter chooses not to respond to the request for information or materials, the investigation may continue without the interpreter's participation.

d. Consulting with a subject matter expert on the duties and requirements to serve as a court interpreter.

2. At the conclusion of the investigation, if grounds for one or more sanctions exist, a charging document is prepared by CIP staff or its legal counsel that provides the evidentiary basis for the conclusions supporting identified sanctions on an interpreter's credential. The charging document will be concurrently: (1) served by CIP staff or its legal counsel on the interpreter; and (2) filed with the Office of Administrative Hearings (OAH), which will thereafter have jurisdiction over the administrative process of pursuing sanctions against an interpreter's credential. CIP staff may in its discretion provide advance notice to the interpreter that a charging document will be filed.

3. Once a charging document is filed and served, the procedures set forth in the Administrative Procedure Act (APA), Government Code section 11500 et seq., will apply and are incorporated herein. The procedures of the APA will apply in pursuing sanctions against an interpreter's credential unless the language in these procedures provides differently, in which case the language in these procedures will control.

4. The interpreter may request a hearing to contest the charges after engaging in good faith dispute resolution efforts as set out below under subdivision (5). To request a hearing, the interpreter must serve a Notice of Defense on the Judicial Council's Court Interpreters Program office, or its legal counsel, within 30 days of service of the charging document. Upon being served a Notice of Defense, the Judicial Council's Court Interpreters Program office or its legal counsel will schedule a hearing with the Office of Administrative Hearings. Failure to timely serve a Notice of Defense by the deadline will result in the interpreter's default in challenging the proposed sanctions pursuant to Government Code section 11520.

5. Prior to filing a Notice of Defense and requesting a hearing, the interpreter and CIP staff or CIP's legal counsel must engage in informal good faith dispute resolution efforts (i.e., a phone conference to discuss potential resolution; formal mediation before a third party is not required). If they are unable to resolve the charges, the case will proceed to hearing.

H. Resolution without Issuance of a Charging Document

With the approval of CIP staff, a request for credential review may be resolved before the issuance of a charging document.

1. A request for credential review may be resolved by:

    a. Voluntary withdrawal of the request for credential review by the complainant before the issuance of the charging document;

    b. Voluntary surrender of the interpreting credential by the interpreter and removal of the interpreter from the Master List; or

    c. A settlement agreement that is signed by the interpreter and the Judicial Council's Administrative Director or his or her designee. Approval of a settlement by the Administrative Director or his or her designee constitutes a final decision and is not subject to further review.

2. Voluntary surrender of the interpreting credential requires the interpreter to provide CIP with written notice of the interpreter's voluntary surrender of the interpreting credential. Upon submission of the written notice to CIP, any credential review and/or administrative hearing process to impose sanctions or revocation on a credential, commenced hereunder will terminate. Upon surrender of the interpreter's credential, the interpreter will be removed from the Master List and will no longer be eligible to interpret in the California courts and be a part of the Court Interpreter's Program. The request for credential review and the sanctions arising from the proceedings may be reviewed in the event the interpreter seeks to reinstate his or her credential.

3. Sanctions taken on a court interpreter's credential may be posted on the CIP webpage consistent with the rules regarding public disclosure.

4. At the discretion of CIP, any of the resolutions provided for above may be considered and accepted after the filing of a charging document.

I. Right to Representation

An interpreter may be represented by legal counsel under these procedures, at the interpreter's expense.

J. Proceedings before the Office of Administrative Hearings and Judicial Council Advisory Panel Review

Hearings will be conducted in the OAH before an administrative law judge and will proceed under the procedures and requirements set forth in the APA.[3]

After a hearing before an administrative law judge, he or she shall prepare a proposed decision and order pursuant to Government Code section 11517(c). Thereafter, the proposed decision and order of the administrative law judge will be reviewed by a three-member panel consisting of current members of the Judicial Council's Court Interpreters Advisory Panel (CIAP) pursuant to Government Code section 11517(c)(2), and the three-member panel may take any action as provided for in that section.[4]

K. Sanction[5] Regarding a Credential

1. The type of sanction on an interpreter's credential must include consideration of aggravating and mitigating circumstances, including but not limited to:

    a. The intent of the interpreter;

    b. The gravity and impact of the harm to the complainant, the court, litigants, third parties, or judicial processes; and

    c. The interpreter's history of prior discipline, including any pattern of improper conduct.

2. Sanctions on an interpreter's credential may include but are not limited to one or more of the following:

    a. Revocation of a certified or registered status credential that is permanent or temporary;

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[3] Administrative Procedure Act, at https://oal.ca.gov/publications/administrative_procedure_act/, and Gov. Code, § 11500 et seq., at https://california.public.law/codes/ca_gov't_code_section_11500.

[4] One member of the three-member panel must be a certified court or registered interpreter member of the Judicial Council's Court Interpreters Advisory Panel.

[5] Separate from the *California Court Interpreter Credential Review Procedures*, California certified court and registered interpreters can be suspended or have their certification revoked for failure to comply with annual compliance requirements as outlined in the Compliance Requirements for Certified Court and Registered Interpreters, at *http://www.courts.ca.gov/23507.htm*.

b. Suspension of certified or registered status for a specified period of time after which the interpreter must make a written request to the Court Interpreter Program for reinstatement of his or her credential;

c. Probation for a fixed period of two years or less during which time the interpreter must meet the probationary terms as defined by the final decision and order to maintain credential status;

d. A requirement that specific education courses be taken to maintain credential status;

e. A public or private reprimand; and

f. A requirement that the court interpreter take the credentialing examinations in place at the time the final decision and order are issued.

L. Notification of Sanction on a Credential

1. CIP staff or its legal representative must notify the complainant, the interpreter, and all relevant courts within 30 days of a final decision and order being issued that specifies a sanction against the interpreter's credential. A final decision and order consist of either the three-member panel's adoption of an administrative law judge's proposed decision pursuant to Government Code section 11517(c)(2)(A)–(D), or issuance of a new decision of the three-member panel pursuant to the procedure described in Government Code section 11517(c)(2)(E).

2. CIP may post information about an interpreter's credential status on the "Court Interpreters Program" webpage consistent with the rules governing public disclosure.

M. Appeals

The interpreter may appeal the final decision and order as authorized by Government Code section 11523 of the APA.

N. Reinstatement

An interpreter whose California court interpreter credential has been suspended or temporarily revoked may apply in writing to CIP for reinstatement within the time established in the decision and order that imposed the sanction. CIP will have sole discretion in determining whether the conditions for reinstatement have been satisfied.

O. Confidentiality

All requests for review, evidence collected, and investigations must be confidential, except when a final decision and order to impose a sanction on an interpreter's credential are reached. In those limited circumstances, the final decision and order, the grounds for the sanction(s) imposed, and the facts cited to support the final decision and order on credential-related sanction(s), up to and including revocation of an interpreter's credential, must be accessible to the public.

A final decision and order exist in accordance with section L, Notification of Sanction on a Credential.

Publicly accessible information may be posted on the Judicial Council's "Court Interpreters Program" webpage or may be made available through a public records request to the Judicial Council under Government Code section 68106.2 and rule 10.500 of the California Rules of Court.

Attachment A

Effective January 1, 2027

California Court Interpreter Credential Review Procedures

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Judicial Council *of* California
Court Interpreters Advisory Panel

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California Court Interpreter Credential Review Procedures

Purpose

Court interpreters play a critical role in facilitating accurate communications between the court and limited-English-proficient users. In performing that crucial function, court interpreters are governed by the professional conduct provisions of rule 2.890 of the California Rules of Court.[1] The Judicial Council of California adopts these credential review procedures[2] in accordance with Government Code section 68562(d), which provides: "The Judicial Council shall adopt standards and requirements for interpreter proficiency, continuing education, certification renewal, and discipline. The Judicial Council shall adopt standards of professional conduct for court interpreters."

These procedures reinforce the professional standards for certified and registered court interpreters by:

1. Establishing a process for the Judicial Council under its authority to issue court interpreter credentials, and to review allegations of professional misconduct or malfeasance against certified and registered court interpreters;

2. Defining the due process protections and procedures governing the credential review process;

3. Seeing that California certified and registered court interpreters meet and maintain minimum professional standards of practice; and

4. Safeguarding the quality and integrity of credentialed court interpreters in California.

The procedures set forth recognize the distinction between the obligations of the Judicial Council as the credentialing body to ensure interpreters abide by the codes of professional conduct as set forth in rule 2.890, *Professional conduct for interpreters*, and those of the employer to ensure interpreter employees follow workplace policies. Trial courts retain the authority to enforce their local personnel policies, collective bargaining agreements, and contractual agreements with independent contract interpreters.

The credential review procedures do not preclude a superior court—consistent with the court's applicable memoranda of understanding, personnel policies, and/or local rules—from receiving and investigating complaints, conducting investigations, and taking the necessary disciplinary or

[1] *Professional Standards and Ethics for California Court Interpreters*, published by the Judicial Council, is based on the principles and requirements set forth in rule 2.890 of the California Rules of Court.

[2] The *California Court Interpreter Credential Review Procedures* were first adopted by the Judicial Council in September 2018 for an effective date of January 1, 2019. This revision, effective January 1, 2027, was prepared under the direction of the Court Interpreters Advisory Panel and approved by the council in [Month/Year].

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corrective action against interpreter employees or contractors who violate a court's rules, policies, and procedures, but rather supplement local court actions.

The credential review procedures are separate from discipline arising from an interpreter's work performance. However, discipline or corrective actions at the court on an employee interpreter may be considered in the credential review process or in regard to actions taken on an independent interpreter's contractual agreement with the court because of an allegation of misconduct or ongoing performance issues.

Jurisdiction

Every certified or registered spoken-language interpreter on the Master List of Certified and Registered Court Interpreters (Judicial Council Master List) is subject to these procedures.[3] Jurisdiction over an interpreter to enforce and act under these procedures exists regardless of whether the interpreter resides in California.

Grounds for Sanctions on Interpreter Credentials

As the entity responsible for issuing credentials to court interpreters in California, the Judicial Council of California's Court Interpreters Program (CIP) may impose sanctions on any California court-certified or registered interpreter, up to and including revocation of an interpreter's credential. The grounds for sanctions may include:

1. Violation of rule 2.890 of the California Rules of Court;

2. Gross incompetence, including, but not limited to, a lack of the necessary knowledge, skills, and abilities required to perform the duties of a court interpreter[4];

3. Deliberate misrepresentation of a certified court or registered interpreter credential, including failure to notify relevant parties of a suspension or revocation of a court interpreter credential;

4. Knowing and reckless disclosure of confidential or privileged information obtained while serving in an official capacity;

5. Fraud, dishonesty, or corruption related to the functions and duties of a court interpreter;

[3] American Sign Language (ASL) interpreters may be credentialed by the Registry of Interpreters for the Deaf (RID) or the Board for Evaluation of Interpreters (BEI). The Texas Health and Human Services website has more information on filing a complaint against a BEI-certified interpreter. Information on filing a complaint against an RID-certified interpreter is available at the Registry of Interpreters for the Deaf website.

[4] See "Knowledge, Skills, and Abilities Essential for Court Interpretation."

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6. Conviction of a felony or misdemeanor;

7. Violation of California or federal law, including discrimination and harassment laws;

8. False or deceptive advertising after receipt of notification to discontinue; and

9. Violation of duties imposed by these procedures.

Statute of Limitations

Requests for a credential review of alleged misconduct, as identified in the Grounds for Sanctions on Interpreter Credentials section and submitted to CIP by an individual or entity **other than a court** more than 90 days after the alleged misconduct occurs will be rejected as untimely, and no further action will be taken.

If a trial court receives a complaint that may require a credential review, the following time limits apply:

1. Requests for credential review submitted by anyone other than a trial court, or that regard an independent contractor, must be submitted to CIP within 90 days of the alleged misconduct.

2. As the employing entity, a court should locally investigate any allegation of employee misconduct. If the results of the investigation may warrant a sanction on the interpreter's credential, the court must submit a request for credential review within 30 days of the completion of the investigation; or

    a. If a court requires assistance in conducting an investigation and it is determined a credential review is required, the court must submit the request to CIP within 90 days of the date of the alleged misconduct; or

    b. If the 90-day period has elapsed, the court must submit the request for credential review to CIP within 30 days of becoming aware of the alleged misconduct, or after addressing an ongoing pattern of conduct that may require a sanction on a court interpreter's credential.

Submitting a Request for Credential Review

Any person or entity, including a court, may submit a request for a credential review to CIP regarding a spoken-language interpreter who is a California certified or registered court interpreter and enrolled on the Judicial Council Master List. The request for credential review:

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1. Must be submitted using the California Court Interpreter Complaint Form, available on the "Court Interpreters Complaints" webpage of the California Courts Language Access Services website.

2. Must be signed and dated under penalty of perjury. During the credential review process, the confidentiality of a complainant's identity will be preserved to the extent permitted by law.

3. The request for credential review must include a detailed description of the alleged misconduct including, if known or available, the date, time, location, name of interpreter, the interpreter's badge number, the case file number of the proceeding interpreted, the names and contact information of any potential witnesses, and any documents or evidence that support the allegations.

4. The request for credential review, including the complaint form and any supporting documentation, must be submitted to CIP or to the local court where the allegation occurred. The request for credential review may be submitted in person, mailed, or sent electronically as follows:

   In person or by mail:

   Judicial Council of California
   Court Interpreters Program
   455 Golden Gate Avenue
   San Francisco, CA 94102-3688

   By e-mail to: credreview@jud.ca.gov.

Assessment of a Request for Credential Review

Within 30 days of receipt of the request for a credential review, CIP staff will assess the request for credential review and determine whether it is complete, meets jurisdictional requirements, and provides sufficient factual allegations that, if true, would constitute grounds for sanctions up to and including revocation of an interpreter's credential.

As part of this assessment, CIP staff will determine whether the alleged conduct may constitute a violation of the California Rules of Court, rule 2.890. Allegations involving gross incompetence under rule 2.890 may result in referral to a skills assessment process to evaluate the interpreter's ability to perform the duties of a court interpreter. Allegations involving other violations of rule 2.890 may result in the issuance of a disciplinary letter from CIP outlining the violation and identifying corrective actions that the interpreter must complete to remain in good standing.

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California Court Interpreter Credential Review Procedures

1. The complainant will be notified within 45 days of the receipt of the request for credential review informing the complainant that the request has been received and is being reviewed; or

2. The complainant may be asked to provide additional information for staff to assess the request for credential review. Supplemental information must be submitted within 30 days, or as directed by CIP staff.

3. CIP staff will notify the complainant of the action to be taken regarding the request for credential review, and:

    a. If the request for credential review meets the jurisdictional requirements, written notice will be provided to the interpreter who is the subject of the request for credential review. The notice will contain a summary of the allegation(s), the date the allegation(s) took place, and the case file number of the case interpreted, if available or applicable. The notice must be sent within 45 days of the receipt of the request for credential review by CIP staff; or

    b. Assessment of the request for credential review may be deferred if the allegations are related to pending civil or criminal litigation. CIP staff will notify the complainant and the subject interpreter of the deferral, the reasons for the deferral, and its anticipated duration, if known.

4. If the allegations in the request for credential review do not meet jurisdictional requirements that warrant sanctions on an interpreter's credential, the complainant will be notified within 45 days of the receipt of the request for credential review.

5. All requests for credential review and investigations are confidential, except when a final determination is made to impose the sanctions as provided in the Notification of Sanction on a Credential section.

6. The final determination, including the grounds for the sanction(s) may be made accessible to the public consistent with the rules governing public disclosure and California Rules of Court, rule 10.500.

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California Court Interpreter Credential Review Procedures

Investigation of Request for Credential Review and Issuance of Charging Document

1. The investigation may include, but is not limited to:

   a. Interviewing the complainant, interpreter, witnesses, and other relevant persons. If the interpreter chooses not to participate or respond to questions, the investigation may continue without the interpreter's participation.

   b. Reviewing records, documents, case files, and other materials.

   c. Requesting information and materials from the interpreter and other relevant persons. The interpreter must respond to all inquiries within 30 days of receipt of the request for information or materials unless CIP staff grants an extension upon a showing of good cause. If the interpreter chooses not to respond to the request for information or materials, the investigation may continue without the interpreter's participation.

   d. Consulting with a subject matter expert on the duties and requirements to serve as a court interpreter.

   e. When allegations question the interpreter's skill and competence, the interpreter may be required to submit to a skills assessment with the interpreter through neutral third-party evaluators selected by the Judicial Council. See the Skills Assessment section below.

2. At the conclusion of the investigation, if grounds for one or more sanctions exist, a charging document is prepared by CIP staff or its legal counsel that provides the evidentiary basis for the conclusions supporting identified sanctions on an interpreter's credential. The charging document will be concurrently (1) served by CIP staff or its legal counsel on the interpreter; and (2) filed with the Office of Administrative Hearings (OAH), which will thereafter have jurisdiction over the administrative process of pursuing sanctions against an interpreter's credential. CIP staff may, in its discretion, provide advance notice to the interpreter that a charging document will be filed.

3. Once a charging document is filed and served, the procedures set forth in the Administrative Procedure Act (APA), Government Code section 11500 et seq., will apply and are incorporated herein. The procedures of the APA will apply in pursuing sanctions against an interpreter's credential unless the language in these procedures provides differently, in which case the language in these procedures will control.

4. The interpreter may request a hearing to contest the charges after engaging in good faith dispute resolution efforts as set out below under subdivision (5). To request a hearing, the interpreter must serve a Notice of Defense on the Judicial Council's Court Interpreters Program, or its legal counsel, within 30 days of service of the charging document. Upon being

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served a Notice of Defense, the Judicial Council's Court Interpreters Program or its legal counsel will schedule a hearing with the Office of Administrative Hearings. Failure to timely serve a Notice of Defense by the deadline will result in the interpreter's default in challenging the proposed sanctions pursuant to Government Code section 11520.

5. Prior to filing a Notice of Defense and requesting a hearing, the interpreter and CIP staff or CIP's legal counsel must engage in informal good faith dispute resolution efforts, such as a phone conference to discuss a potential resolution; formal mediation before a third party is not required. If they are unable to resolve the charges, the case will proceed to hearing.

Skills Assessment

Skills assessment serves as an investigative tool to identify specific performance issues and areas needing improvement. A complaint alone does not trigger a skills assessment. An assessment may be required only after reviewing supporting evidence, notifying the interpreter of the interpreting-skills concern, providing an opportunity to respond, and determining that an assessment is necessary to evaluate the concern. If the skills assessment reflects substantive deficiency, it may be the basis for additional sanctions as outlined in the Notification of Sanction on a Credential section. The assessment results will be shared with the interpreter and considered alongside other evidence gathered during the investigation. More information on the skills assessment process is included in Attachment A.

The skills assessment process may include but is not limited to the following:

1. Referral of the interpreter to complete a standardized third-party skills assessment evaluation process, developed by the Judicial Council and National Center for State Courts in collaboration with court interpreters and subject matter experts.

2. Notice to the interpreter that participation in the skills assessment process is required as part of the investigation when skill or competence is at issue.

3. Administration of the assessment by qualified and neutral third-party evaluators selected by the Judicial Council with subject matter expertise in court interpreter performance standards.

4. Evaluation of performance in relevant modes of interpreting (e.g., consecutive, simultaneous, sight translation), as applicable to the allegations.

5. Review of the assessment results by CIP and Judicial Council staff and, when appropriate, consultation with subject matter experts to interpret the findings.

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6. Consideration of the assessment results as part of the totality of evidence in determining whether probable cause exists to issue a charging document.

7. If the interpreter fails to participate in the skills assessment process as required, the investigation may proceed based on the available evidence. Failure to participate in skills assessment may be grounds for suspension until a decision regarding revocation is determined. The stated justification behind the interpreter's unwillingness or inability to participate in the skills assessment process will be considered when determining a sanction.

Resolution Without Issuance of a Charging Document

With the approval of CIP staff, a request for credential review may be resolved before the issuance of a charging document.

1. A request for credential review may be resolved by:

   a. Voluntary withdrawal of the request for credential review by the complainant before the issuance of the charging document;

   b. Voluntary surrender of the interpreting credential by the interpreter and removal of the interpreter from the Judicial Council Master List; or

   c. A settlement agreement that is signed by the interpreter and the Judicial Council's Administrative Director or their designee. Approval of a settlement by the Administrative Director or their designee constitutes a final decision and is not subject to further review.

   d. Issuance of a disciplinary letter[5] by CIP to the interpreter with specific actions that the interpreter must undertake to remain in good standing. The possible actions include, but are not limited to, completing ethics training, undergoing a skills assessment, completing recommended courses to enhance interpreting skills, and/or retaking the credentialing examination(s) to demonstrate competence. The interpreter may either accept it and forgo an Office of Administrative Hearings (OAH) hearing, or request referral to OAH for review and determination.

2. Voluntary surrender of the interpreting credential requires the interpreter to provide CIP with written notice of the interpreter's voluntary surrender of the interpreting credential. Upon submission of the written notice to CIP, any credential review and/or administrative hearing

[5] Possible subjects of a disciplinary letter issued against a court interpreter could include misinterpretation and inaccuracies, lack of proficiency, breach of confidentiality, bias and partiality, conflict of interest, inappropriate behavior, tardiness and absenteeism, failure to prepare, violation of code of ethics, and failure to follow court procedures.

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process to impose sanctions or revocation on a credential, commenced hereunder will terminate. Upon surrender of the interpreter's credential, the interpreter will be removed from the Judicial Council Master List and will no longer be eligible to interpret in the California courts and be a part of the Court Interpreters Program. The request for credential review and the sanctions arising from the proceedings may be reviewed in the event the interpreter seeks to reinstate his or her credential.

3. Sanctions taken on a court interpreter's credential may be posted on the CIP webpage consistent with the rules regarding public disclosure.

4. The subject and terms of disciplinary letters issued by CIP to the interpreter will be posted to the interpreter's public entry in the Judicial Council Master List only after the interpreter accepts the letter or the OAH review reaches a final determination upholding it.

5. At the discretion of CIP, any of the resolutions provided for above may be considered and accepted after the filing of a charging document.

Right to Representation

An interpreter may be represented by legal counsel under these procedures, at the interpreter's expense.

Proceedings Before the Office of Administrative Hearings and Judicial Council Advisory Panel Review

Hearings will be conducted in the OAH before an administrative law judge and will proceed under the procedures and requirements set forth in the APA.[6]

After a hearing before an administrative law judge, the judge shall prepare a proposed decision and order pursuant to Government Code section 11517(c). Thereafter, the proposed decision and order of the administrative law judge will be reviewed by a three-member panel consisting of current members of the Judicial Council's Court Interpreters Advisory Panel (CIAP) pursuant to Government Code section 11517(c)(2), and the three-member panel may take any action as provided for in that section.[7]

[6] Administrative Procedure Act and Gov. Code, § 11500 et seq.

[7] One member of the three-member panel must be a certified or registered court interpreter member of the Judicial Council's Court Interpreters Advisory Panel.

Sanction[8] Regarding a Credential

1. The type of sanction on an interpreter's credential must include consideration of aggravating and mitigating circumstances, including but not limited to:

   a. The intent of the interpreter;

   b. The gravity and impact of the harm to the complainant, the court, litigants, third parties, or judicial processes; and

   c. The interpreter's history of prior discipline, including any pattern of improper conduct.

2. Sanctions on an interpreter's credential may include but are not limited to one or more of the following:

   a. Revocation of a certified or registered status credential that is permanent or temporary.

   b. Suspension of certified or registered status for a specified period after which the interpreter must make a written request to the Court Interpreters Program for reinstatement of his or her credential.

   c. Probation for a fixed period of two years or less during which time the interpreter must meet the probationary terms as defined by the final decision and order to maintain credential status.

   d. A requirement that specific education courses be taken to maintain credential status.

   e. A public or private reprimand, which may include one of the other sanctions.

   f. A requirement that the interpreter undergo a skills assessment, which may result in additional sanctions, including suspension of the interpreter's credential and/or the initiation of proceedings for revocation if warranted. Failure to participate in the skills assessment may be considered in any subsequent determination regarding disciplinary action or sanctions.

   g. If an interpreter does not demonstrate improvement following a subsequent skills assessment and completion of recommended training, the CIP may require the interpreter

[8] Separate from the *California Court Interpreter Credential Review Procedures*, California certified court and registered interpreters can be suspended or have their certification revoked for failure to comply with annual compliance requirements as outlined in the *Compliance Requirements for California Certified Court and Registered Interpreters*.

to retake the credentialing examination(s). In matters referred to the OAH, the OAH may impose the same requirement in its final decision and order.

h. A disciplinary letter that will be issued to the interpreter by CIP. The subject and terms of this letter will be posted to the interpreter's public entry in the Judicial Council Master List only after the interpreter accepts the letter or the OAH review reaches a final determination upholding it.

Notification of Sanction on a Credential

1. CIP staff or its legal representative must notify the complainant, the interpreter, and all relevant courts within 30 days of a final decision and order being issued that specifies a sanction against the interpreter's credential. A final decision and order consist of either the three-member panel's adoption of an administrative law judge's proposed decision pursuant to Government Code section 11517(c)(2)(A)–(D), or issuance of a new decision of the three-member panel pursuant to the procedure described in Government Code section 11517(c)(2)(E).

2. CIP may post information about an interpreter's credential status on the "Court Interpreters Program" webpage consistent with the rules governing public disclosure.

3. If disciplinary letters are issued by CIP or sanctions are issued by OAH after a hearing, staff will add this information to the interpreter's public record on the Judicial Council Master List.

Appeals

The interpreter may appeal the final decision and order as authorized by Government Code section 11523 of the APA.

Reinstatement

An interpreter whose California court interpreter credential has been suspended or temporarily revoked may apply in writing to CIP for reinstatement within the time established in the decision and order that imposed the sanction. CIP will have sole discretion in determining whether the conditions for reinstatement have been satisfied.

Confidentiality

All requests for review, evidence collected, and investigations must be confidential, except when a final decision and order to impose a sanction on an interpreter's credential are reached. In those limited circumstances, the final decision and order, the grounds for the sanction(s) imposed, and

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the facts cited to support the final decision and order on credential-related sanction(s), up to and including revocation of an interpreter's credential, must be accessible to the public.

A final decision and order exist in accordance with the Notification of Sanction on a Credential section.

Publicly accessible information may be posted on the Judicial Council's "Court Interpreters Program" webpage or may be made available through a public records request to the Judicial Council under Government Code section 68106.2 and rule 10.500 of the California Rules of Court.

Attachment A: Skills Assessment Process and Mechanism

In 2021, the Professional Standards and Ethics Subcommittee of the Court Interpreters Advisory Panel (CIAP) explored the feasibility and best available methods for:

1. Development of a legally defensible diagnostic process to assess an interpreter's ability to interpret if a complaint alleging gross incompetence or serious/repeated inaccuracy is submitted against the interpreter and the complaint is deemed to be supported by substantial evidence.
2. Identification of existing and possible development of options and resources that courts can utilize to strengthen an interpreter's knowledge, skills, and abilities (KSAs).[9]

The subcommittee determined that the assessment process should be fair, valid, and reliable, and that it will be based on the KSAs generally expected of court interpreters.

CIP anticipates that a well-defined process and mechanism for skills assessment will be a valuable tool for evaluation of an interpreter's current KSAs, primarily serving to pinpoint areas for improvement and identify additional training or resources needed for skill improvement. The evaluation process will be used with an intent to positively impact an interpreter's performance and not to challenge an interpreter's credential unless it becomes necessary to do so. The overall goal of the skills assessment process is to benefit court interpreters by utilizing a valid, reliable, and fair assessment tool that accurately reflects the KSAs being used on the job.

In 2022–25, the council contracted with the National Center for State Courts (NCSC) to support the development or revision of diagnostic tools (intake instruments, observation tools, checklists, etc.) and supportive resources to assist the council with assessing interpreting KSAs.

[9] See "Knowledge, Skills, and Abilities Essential for Court Interpretation."

California Court Interpreter Credential Review Procedures

The mechanism and process outlined below include the recommended process developed by NCSC to initiate and conduct skills assessments.[10] The mechanism is not static and remains subject to continuous review and improvement.

After the Court Interpreters Program (CIP) has received a complaint and determined that it validly raises allegations and concerns regarding a credentialed interpreter's ability to interpret, the interpreter of the concern will be notified and provided an opportunity to respond. A complaint alone does not trigger a skills assessment. If CIP determines that the evidence supports a legitimate interpreting-skills concern and that an assessment is necessary to evaluate it, CIP will refer the matter and relevant supporting information to an outside, neutral vendor to begin the assessment process.

1. In order to obtain additional information regarding allegations or concerns pertaining to an interpreter's interpreting ability, CIP staff may request completion of a standardized questionnaire, developed by NCSC, with court staff and the interpreter who is the subject of the complaint. These questionnaires are designed to gather additional context regarding allegations or concerns pertaining to an interpreter's interpreting ability in order to assist with the assessment. The questionnaire is not the sole basis for a determination as to whether an interpreter requires a skills assessment.

2. Based on the nature of the complaint and information gathered during CIP's fact-finding process, CIP may either refer the interpreter to additional training resources or initiate a live, proctored skills assessment process developed and administered by neutral third-party evaluators selected by the Judicial Council. A skills assessment may be initiated either because of one or more substantiated complaints regarding an interpreter's poor performance or lack of proficiency in the credentialed language. For minor skills-based complaints, CIP may elect to require the interpreter to participate in training resources to achieve needed improvements rather than recommend a skills assessment. CIP retains discretion in making its determinations.

3. The skills assessment will be conducted virtually and will include prepared audio recordings, scripts, and interpretation scenarios that mirror typical court interactions. The skills assessment will be recorded. It will also be evaluated by a minimum of two evaluators using an approved scoring rubric. The virtual assessment will be used to identify court interpretation skills and areas for improvement. The skills assessment

[10] These recommendations do not cover assessment of potential physical, hearing, or visual impairment issues, which are covered under the Americans with Disabilities Act (ADA). The ADA requires reasonable accommodations as they relate to three aspects of employment: (1) ensuring equal opportunity in the application process, (2) enabling a qualified individual with a disability to perform the essential functions of a job, and (3) making it possible for an employee with a disability to enjoy equal benefits and privileges of employment.

process is *not* intended to be a pass/fail assessment and will not be used as the final determination of an interpreter's credential.

4. The two or more evaluators conducting the evaluation shall possess the highest level of court interpreter credentials and/or linguist credentials available and shall have been trained on how to conduct a virtual assessment evaluation using the standardized rating process developed by NCSC.[11]

5. Once a skills assessment evaluation is completed, its results will be first shared with CIP. At a later date that is identified by CIP, the results will also be shared with the court interpreter and the interpreter's employer court (if the interpreter is court-employed), and the court where the incident(s) that led to the submission of the complaint took place (if not the interpreter's employer court). A follow-up appointment will be scheduled between the outside vendor, CIP staff, and the interpreter to review the results of the assessment and provide guidance for the interpreter. If appropriate, the employer court (if any) and CIP will work with the interpreter to identify court interpreter skills-building resources and materials to assist the interpreter with any areas requiring improvement.

6. If appropriate, the evaluator, employer court, and/or CIP may recommend that the interpreter be reevaluated with the skills assessment process at a future date as needed.

7. Depending on the skills assessment results, CIP may also require the interpreter to retake the Bilingual Interpreting Examination (BIE), Written Examination, and/or Oral Proficiency Examination (OPE) in English and the target language. This recommendation would only be made in the unusual circumstances where (1) an assessment indicates that the interpreter appears to lack sufficient proficiency in English and/or their credentialed language; (2) if after an amount of time deemed appropriate, a reevaluation indicates that the interpreter still does not appear to have made the recommended minimum skills improvements necessary to perform the duties of an interpreter; and/or (3) additional skills-based complaint(s) continue to be received by the employer court and/or CIP regarding the interpreter.

8. As a final step, the CIP may request that an interpreter forfeit their credential or, if necessary, initiate a credential review hearing to potentially revoke the credential if any of the following occur: (1) the interpreter's deficiencies in skills and abilities are egregious and not correctable; (2) the interpreter is required to retake the credentialing examination(s) and fails to pass them within twelve (12) months, or within another time period specified by CIP; or (3) the interpreter refuses to retake the required examination(s).

[11] Evaluators must be native speakers of the non-English language and should hold the highest level of applied linguistic credentials available, including court interpreter certification in designated languages.

9. For languages of lesser diffusion for which there is no OPE available in the credentialed language, CIP may still administer the assessment as well as require a retest with the English OPE to determine sufficient proficiency in English. If the results from these processes indicate a deficiency in interpreting skills and abilities and/or a lack of proficiency in English, CIP may consider requesting a credential review hearing for the interpreter, or CIP may continue to direct the interpreter to training and resources to help support needed improvements.

10. The same substantive threshold for requiring a skills assessment and the same procedural protections apply to interpreters regardless of language. CIP will make every effort to identify evaluators in the interpreter's language and to develop a skills assessment process for every certified language as resources become available. However, there may be languages of lesser diffusion in which evaluators with the requisite credentials to assist with the assessment are not available.

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