

April 3, 2026

To:

House Committee on Finance:

Representative Chris Todd, Chair, reptodd@capitol.hawaii.gov

Representative Jenna Takenouchi, Vice Chair, reptakenouchi@capitol.hawaii.gov

**Re: Comments on Hawaii SB3238–
Relating to Language Access**

To the Honorable Members of the Committee:

The National Association of Judiciary Interpreters and Translators (NAJIT) wishes to express its appreciation for the opportunity to comment on this pending legislation. NAJIT commends the Hawai'i Legislature for recognizing the importance of language access and for acknowledging translation and interpretation as essential professions in SB3238. Establishing a pathway for bilingual individuals to enter the field is a positive step toward expanding Hawai'i's language access workforce.

Founded in 1978, NAJIT represents more than 1,000 court interpreters, translators, judicial officers, scholars, and trainers dedicated to advancing professional standards and ensuring equal access to justice for individuals who are limited English proficient. NAJIT urges lawmakers and the University of Hawai'i to ensure that any program intended to prepare qualified translators and interpreters reflects the realities of these professions and the standards necessary to protect the public.

While SB3238 outlines a promising framework, several critical components require clarification and strengthening:

1. Generic, English-only training cannot produce competent interpreters or translators

Training in ethics, standards, and best practices is important; however, when delivered generically and without language-specific components, it does not develop the skills required for professional interpreting or translation. These are specialized, performance-based disciplines that require intensive, language-specific practice and feedback.

2. Interpreting and translation are distinct professions

While interpreting (spoken language) and translation (written language) share foundational competencies, they require different cognitive processes, training methods, and assessment tools. Programs must clearly distinguish between the two and provide separate, discipline-appropriate training tracks. Internship opportunities should be available for both disciplines.

3. High-level bilingualism is essential and not universal

Not all bilingual individuals can interpret or translate. Some individuals may have a natural aptitude, others may develop the skills through rigorous, language-specific

training, and some may not acquire these competencies despite extensive effort. Professional interpreting requires advanced language proficiency aligned with ILR Level 3 performance standards, along with specialized skills. Professional translation similarly requires advanced proficiency in both languages and discipline-specific competencies. These cannot be achieved through general bilingualism alone.

4. **Language-specific skills training must be delivered by qualified professionals**

Students must receive instruction from qualified interpreter and translator trainers with appropriate credentials and professional experience. Without this expertise, programs cannot ensure that trainees acquire the competencies required for high-stakes environments.

5. **Specialized, domain-specific instruction is indispensable**

Interpreters and translators must develop expertise in specific fields such as law, healthcare, education, social services, and government. These domains require accuracy, confidentiality, and adherence to due process. A generalist curriculum is insufficient preparation.

6. **Internships must be supervised by qualified professionals**

Internships must be structured, standards-based, and supervised by certified or otherwise qualified professionals. Allowing unsupervised practice creates legal and ethical risks. Until an intern has obtained appropriate certification, a qualified professional should be present to monitor performance, intervene when necessary, and ensure that services provided to the public meet professional standards.

7. **Assessment must align with recognized professional benchmarks**

Completion of coursework alone does not establish competency. Programs must include assessment mechanisms aligned with nationally recognized proficiency and performance standards to ensure graduates are prepared for professional practice.

8. **Educational certificates are not licenses to practice**

Educational institutions provide training but do not confer professional certification. A certificate of completion must not be interpreted as equivalent to certification by recognized credentialing bodies such as the American Translators Association, the Hawai'i Judiciary, or the federal courts. Maintaining this distinction is essential to avoid confusion and protect the public.

NAJIT strongly supports Hawai'i's goal of expanding language access and building a robust bilingual workforce. We stand ready to collaborate with the University of Hawai'i, the Department of Education, the Department of Labor and Industrial Relations, and other stakeholders to strengthen the program envisioned in this legislation.

Our organization brings decades of expertise in professional standards, ethics, training, and assessment. We welcome the opportunity to support the development of a program that ensures high-quality, accurate, and ethically grounded language access services for Hawai'i's communities.

We appreciate the Legislature's leadership on this important issue and thank you for the opportunity to provide input. We are available to provide additional information or to collaborate further as this legislation moves forward.

Respectfully submitted,
The NAJIT Board of Directors

For additional information or clarification, please contact NAJIT at office@najit.org

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American Association of Interpreters and Translators in Education (AAITE)

Association of Language Companies (ALC)

American Translators Association (ATA)

Certification Commission for Health Care Interpreters (CCHI)

Canadian Language Industry Association (CLIA) / Association canadienne de l'industrie de la
langue (ACIL)

National Council on Interpreting in Health Care (NCIHC)