American Translators' Association 225 Reineker's Lane, Suite 590 Alexandria, VA 22314

## Dear Fellow Translators:

While I appreciate the work done by ATA to professionalize the business of translation, as a translator for over 30 years and a member of ATA for 20 with accreditations in French-English and German-English, I would like to pose some questions concerning the proposal that translators be required to prove they have earned continuing education credits. The argument that was given in *The Chronicle* likened translators to accountants, doctors and nurses, but doctors and nurses are licensed by the state and are mandated by law to take training in their fields to keep their licenses for the sake of their patients. Certified public accountants are required to stay abreast of changes in the tax laws by the government. We are not state-licensed, nor are we governed by federal law. Does the translation industry need to be regulated in the same way as the medical and accounting professions? This issue raises many questions, including the following.

Question 1: Do we want to give our organization the power to regulate us? The other professions are regulated not so much from within as by the state and federal governments. Is this form of regulation necessary in our industry? Many professions are unregulated and work just as well without regulation. We don't have to get continuing education credits to keep our high-school and college diplomas. If fewer than 20% of those who take the accreditation exam actually pass it, then those who do pass are presumably very well qualified and will continue their education on their own with little or no prompting from ATA.

<u>Question 2</u>: What is the purpose of enforcing such continuing education? Will it actually help us as translators or will it profit only those few institutions and individuals who teach the courses? Certificates may impress clients, but they are no guarantee that translators who attend workshops can do the work. Translators are involved in continuing education by the very nature of their work. Do they have to be forced to attend seminars and workshops on penalty of losing their certification?

<u>Question 3</u>: Who decides what an "approved" workshop is? Most translators have to work in many fields. It would be impossible to be certified in all of them and pointless to be certified in only one or two, since many of us could not earn a living working in only one field. Most local schools do not offer such specialized training. Where will we have to go to take such courses? Will ATA get into the business of organizing correspondence courses? The Internet has provided a window into almost every field there is, and a good translator can usually obtain information without leaving home or paying anything.

Question 4: If a person works in only one industry, pharmaceuticals, for example, and has the opportunity to receive continuing education in that industry, would that person have to take other courses to keep an ATA certification? Or would training by that industry qualify? Who would decide which industries' workshops were approved and which were not? Large corporations can afford to pay for their employees' courses. Doesn't that put free-lancers at a disadvantage? Seminars are expensive, we have to take time off and travel, so it is important that they result in direct benefits to us. Is it fair for ATA to demand that free-lancers shut down their offices and pay travel, lodging and seminar costs to take workshops just to keep what they have already earned? This requirement could result in a loss of income for some translators.

Question 5: How will this improve our credibility? I understand that ATA wants to protect clients from shoddy work, but this type of action may reinforce the already prevalent idea that the best translations are done by the people with the most titles and those who can market themselves best. Why do some translators lack credibility? Perhaps the problem is not their training, but their ethics, i.e., they take work they can't do. Right now, the free market decides which translators get work based on how they actually perform, not what is on their resumes. Isn't that a better way to decide who is qualified?

<u>Question 6</u>: What happens to translators who don't have to take seminars because they are not available in their languages? Will the requirement to attend workshops penalize translators of common languages and exclude translators of less common languages? Won't this result in a form of discrimination?

Question 7: To whom would translators give the power to take away their certification? ATA is an association set up to help translators, not threaten, police or punish them. Who would make the decision to withdraw a translator's certification? An elected board? And what criteria would they use? If we set up such a board and give it power, will those elected feel they must use it to justify their existence? Won't this bring up all kinds of issues involving power, its use and misuse? Do we want or need such watchdogs? Do we want to give anyone the power to take away our means of earning a livelihood?

<u>Question 8</u>: What will be the cost of adding this paperwork to the ATA and who will pay it? Will it be done by volunteers or paid professionals? Will it require an increase in dues or fees? Will it add an extra layer of organizational bureaucracy that will keep growing, as it does in the government?

These are serious questions that should be considered by all ATA members. Changing the name from "accreditation" to "certification" will not have much of an effect on us. But demanding that translators prove they have earned continuing education credits could have a definite impact on many of our lives, and we should not vote on this without fully considering the ramifications of doing so. I hope these questions and others will be brought up for discussion by my fellow translators before a vote is taken on this question.

Sincerely yours,

Sally Costello