ProLanguage Interpreters wants to make one point very clear: it never takes us a year to bill a **first** billing. We bill all appointments every week for that week's appointments if we have enough claim information.

What **is** a problem is getting the bills **paid** by the insurers within one year without repeatedly re-submitting bills. **That's** where the mismatch in human and financial resources becomes painfully obvious.

There are two distinct issues here: 1. Initial billing; 2. Re-submitting or presenting a bill to the insurer and the WCD through the Dispute process or in simply re-billing unpaid balances.

Through various strategies, insurers can build up a huge backlog of services already performed by interpreters yet unpaid by insurers. Multiply this backlog by several insurers and the burden on the interpreter is extremely burdensome. The fact that an insurer is complaining of increasing work burden may be a tacit admission that insurers' tactics are becoming more effective in delaying payment. They may be asking to be rewarded for increasing delay of payment.

Currently, the WCD allows interpreters to submit bills remaining unpaid for a maximum of one year from the Date Of Service (DOS). It's our understanding that the WCD includes initial billings and re-billings.

By raising Issue # 7, It appears that the insurer may want the Workers' Compensation Division to say that **unpaid invoices PRESENTED or SUBMITTED (in any manner) over 180 days from the Date Of Service are no longer collectible.**

We solicit the WCD to make it manifestly clear that this refers only to a **first or initial** billing**.**

If it were to include any subsequent billing, this decision would irreparably harm all interpreters who would be unable to reap benefits from work already performed, but unpaid by insurers over 180 days after the DOS.

In our case, we have a backlog of scores of invoices unpaid by insurers 180 to 365 days after the DOS, worth close to $43K.

What sounds like simply correcting an annoying problem for insurers, has the potential to wreak ruin for interpreters **if Issue # 7 is interpreted as disallowing interpreters to present bills unpaid over 180 days after the DOS as part of the WCD Dispute process or normal billing cycles.**

In regard to racial / gender equity, it's hard to think of a more effective and subtle way to disenfranchise minority and woman business owners. It only takes a few moments of thought to realize that women and minorities are very highly represented in the interpreting / translating community. We would say our experience is that it's in the 90-95 % range.

We have interpreters for over fifty languages, representing peoples worldwide.

The Oregon Workers' Compensation Division is the only protective power standing between multi-racial, multi-religious and multi-cultural interpreters over against mammoth insurance companies with thousands of employees and billions in financial resources.

We urge the WCD in the strongest terms possible not to give Issue # 7 a more-restrictive "180-days from DOS to re-submit for payment" interpretation and to retain the traditional one-year from Date Of Service dispute / re-bill window.