

Division of Vocational  
Rehabilitation;  
Florida Department of  
Education

2015

# VR Guide for Provision of Interpreting Services for Individuals with Hearing Loss\*

\* This includes individuals  
Who are Deaf, Hard of Hearing,  
Late-Deafened, and Deaf-Blind

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## INTRODUCTION

### PURPOSE

The Division of Vocational Rehabilitation (DVR) of the Florida Department of Education (DOE) recognizes the critical nature of communication access for its individuals and staff who are deaf, hard of hearing, late-deafened, and deaf-blind. Among the various methods of accommodations provided to these individuals is the provision of quality interpreting services.

The VR Manual on Interpreter Services for Persons who Work with Individuals who are Deaf and Hard of Hearing (2009) was originally developed to serve as a guideline when securing quality interpreting services. This updated version, VR Guide for Provision of Interpreting Services for Individuals with Hearing Loss (2013), incorporates the latest standards and practices of professional interpreters who work for and with VR and provides the framework for service consistency throughout DVR statewide.

The purpose of this document is to establish uniform Vocational Rehabilitation (VR) guidelines to provide effective interpreting services to individuals with hearing loss.

### DEFINITIONS

For the purpose of this manual:

**DOE** - The Florida Department of Education under which the Division of Vocational Rehabilitation is housed.

**DVR** - Division of Vocational Rehabilitation.

**VR**- Vocational Rehabilitation (when pertaining to services).

**Interpreting Services** - Providing an interpreter at the time and place needed for an individual with a hearing loss to access and participate in VR programs or activities. The individual requiring access may be an individual, a relative of an individual, a community member, an employee, an employer, or other stakeholder.

**Individual with a Hearing Loss** - Any person who is deaf, hard of hearing, late-deafened, or deaf-blind.

**Individual** - A customer receiving any aid, benefit, service or training through any program or activity of VR, including staff job applications, claimants, employers, and other participants in VR activities.

**Referral/Applicant** – An individual who is applying for VR services.

**Stakeholder** – An individual who has a vested interest in the outcome of the case. These roles may include parents, spouses, children, advocates, or community members involved.

**Qualified Interpreter** - As defined in 28 CFR Part 35 of Title II in the ADA - An interpreter “is able to interpret effectively, accurately, and impartially both receptively and expressively, using any necessary specialized vocabulary.” VR ensures compliance by utilizing interpreters who have proven competence through successfully passing national or state interpreting exams.

**Staff Interpreter** [career service or contracted] - A member of the local field office rehabilitation team who provides interpreting services to individuals with hearing loss and/or DVR staff. The staff interpreter facilitates communication in any VR related appointments or activities. This staff member may provide guidance on matching language needs with available resources and on coordinating interpreter services. Additionally, the staff interpreter shares information and referral with Counselors and staff to ensure that individuals with hearing loss receive all necessary referrals, accommodations, and services.

**Contract Staff Interpreter** - An employee who functions as a full-time staff interpreter in a VR office through a contract agreement. The interpreters employed under a contract shall be treated as members of VR staff and not considered as outside providers.

**Vendor Interpreter** - A qualified service provider who meets DVR’s standard for Vendor qualifications. Registered vendor interpreters are found in RIMS Vendor Directory under Interpreters for the Deaf.

**Appearance Fee** - The minimum charge a vendor interpreter will accept to be paid to provide services.

For more definitions relevant to providing interpreting services to this population, see Appendix A: Terminology on page 38.

## LEGAL STANDARDS

Every state is expected to have a program policy on interpreting services. These guidelines comply with Title V, Section 504 of the Rehabilitation Act of 1973 (504), as amended (PL 99-506 and 100-630, 29 CFR) and Title II of the Americans with Disabilities Act of 1990 (ADA), as amended (PL 101-336 and 110-325, 42 U.S.C.)

Section 504 mandates nondiscrimination on the basis of a disability in federally assisted programs and activities.

The Americans with Disabilities Act extended the mandate to include state and local government programs that do not receive federal financial assistance. Title II of the Americans with Disabilities Act (ADA) requires government entities to make appropriate *auxiliary aids and services* available to ensure *effective communication*. Generally, the requirement to provide an auxiliary aid or service is triggered when an individual with a disability requests it.

*Effective communication* (as in ADA) is understood to mean that whatever is written or spoken must be as understandable to people who have a hearing loss as it is for people who do not have hearing loss. The effective communication requirement applies to ALL members of the public with disabilities, including applicants, participants, and people who contact state or local government agencies seeking information about programs, services, or activities.

One type of auxiliary service commonly provided by VR is interpreting services. The ADA defines a *qualified interpreter* as someone “who is able to interpret effectively, accurately, and impartially both receptively and expressively, using any necessary specialized vocabulary.”

VR ensures compliance by utilizing interpreters who have proven competence through successfully passing national or state interpreting exams. Vendor Interpreters shall possess such credentials. These interpreters meet a specific minimum level of competency and are expected to interpret at the level as indicated by the interpreter’s credential.

Interpreter services are covered in the Operational Policy and Procedure Manual for VR Counselors (Counselor Policy Manual) or the Policy Manual for VR Privatization Initiatives, as appropriate.

## **INTERPRETING SERVICES NEEDS**

VR recognizes the importance of providing auxiliary aids and services as reasonable accommodations. Providing an interpreter (staff or vendor) ensures access to the information needed by individuals in order to participate in the VR process. It enables the person to have informed choice. The interpreter is the link that allows interaction between the deaf and hearing people who may have different communication and cultural perspectives.

The counselor will inform the individual with hearing loss that VR will provide interpreting services as needed to ensure effective communication. In addition, VR staff will explain the procedures used within the VR unit to request interpreting services.

## **INTERPRETING SERVICES FOR VR EMPLOYEES WITH HEARING LOSS**

VR will request, arrange, and pay for interpreting services for an employee when services are needed for work-related activities.

When meetings and activities are mandated for all VR staff to attend, a vendor interpreter will be hired so that the staff interpreter can participate as a staff member. In other situations and if appropriate, staff interpreter(s) may interpret meetings and other activities. Staff responsible for facilitating or conducting meetings will ensure that interpreting services are arranged beforehand and made available so employees have equal access to all work-related activities.

## INTERPRETING SERVICES FOR EMPLOYEES AND PARTICIPANTS WITH HEARING LOSS IN OTHER STATE DIVISIONS OR AGENCIES

Each division/bureau within DOE and all other state agencies are responsible for ensuring accessibility to their programs, as well as providing accommodations to individuals with hearing loss. They will be responsible for arranging and hiring interpreters or providing other appropriate auxiliary aides and services requested by the employee or participant.

## GUIDELINES FOR VR STAFF SERVING THIS POPULATION

### DETERMINING ACCOMMODATIONS

The VR staff is expected to maintain full, effective, and clear communication with all individuals with hearing loss. During an initial contact with the individual (or as noted on the VR application), the VR staff shall inquire about and honor the individual's preference for auxiliary aids or services (i.e. interpreting services) [ADA Sec.36.303] and do their best to meet those requests.

The communication needs of individuals with a hearing loss vary significantly. Some communication methods include:

- Speech and speech reading
- Writing
- Gesturing
- Sign Language (e.g. Signed English, American Sign Language)
- Combination of techniques

The communication ability and modes of communication also vary considerably among individuals with hearing loss. The extent to which each person uses sign language, along with other cues such as body language, facial expressions, and speech reading, will vary. Contrary to popular belief, not every person with hearing loss has speech-reading skills or understands American Sign Language. Types of interpreting services vary depending on the individual's communication mode and ability. This population includes individuals who utilize manual, oral, and/or tactile interpreters as well as technological accommodations for hearing such as assistive listening devices. This group may also include individuals who have multiple disabilities in addition to a hearing loss and individuals who are not proficient in ASL or English.

**The VR staff is expected to document preference and provision of auxiliary aids and services in each case note after contact with individual.**

Additional information on this topic can be found in the Guide on Serving Individuals Who are Deaf, Late-Deafened, Hard of Hearing, or Deaf-Blind.

## **TIPS FOR EFFECTIVE COMMUNICATION WITH INDIVIDUALS WITH HEARING LOSS**

The speaker should:

- Avoid sitting in front of a window with light behind him/her since this creates a shadow on the face that affects the ability of the individual watching to read signs or speech-read.
- Speak in a tone that is clear, distinct, and at a normal pace. Do not over-exaggerate lip movement or speech pace.
- Maintain eye contact. This is of primary importance. Looking away may cause the person with hearing loss to falsely assume that the conversation is over or that the speaker is no longer interested in maintaining the conversation.
- Keep hands away from his/her face while talking. Eating, smoking or adjusting glasses makes it difficult for the individual with hearing loss to speech-read the speaker.
- Utilize non-verbal behavior or body language; point to things and pantomime ideas when an interpreter is not present.
- Rephrase sentences if it appears that the individual with hearing loss is not getting the message. Use examples or parallels for clarification as appropriate.
- Ask the individual with the hearing loss to summarize what has just been said to ensure understanding.
- Ask the individual with a hearing loss to repeat any words that are unclear so the hearing person understands more clearly. If the word or phrase remains unclear, ask the person to write it down.
- Approach individuals with hearing loss by walking into their line of vision or tapping them on the shoulder or upper arm to let them know that a person is there.
- Use pencil and paper to communicate, but be mindful that the grammar of English and American Sign Language (ASL) is different. If using written notes, pay attention to comprehension and frustration. If needed, reschedule the appointment with an interpreter present.
- Consult with the individual to verify the effectiveness of accommodations provided.

When using an Interpreter, the speaker should:

- Speak directly to and face the individual with hearing loss, not to the interpreter.
- Avoid directing comments to the interpreter such as, “tell him” or “ask her.”
- Keep in mind that the interpreter may lag a few words behind the speaker or signer. Allow time for the interpreter to process the meaning of the information in order to most accurately interpret the message.
- Allow the interpreter to determine the most appropriate location to stand or sit. It is part of the interpreter’s responsibility to position him- or herself so that the individual with hearing loss can see the speaker’s facial expressions and eye gaze and the interpreter’s message as signed.

**American Sign Language (ASL) and English are different languages.**

Users of ASL and English are bilingual [Grosjean, 133]. Each individual’s skill level in written English may vary.

- ASL is one of the world’s languages that does not have a written form [Ann, 33]. Therefore, writing back and forth in English uses an ASL user’s second language (in written form) to communicate. It may not be an effective communication method for some ASL users.
- The linguistic components of the two languages differ [Grosjean; Ann]. These differences can affect the comprehension and production of written English; for example:
  - Verb constructs and the grammatical order of parts of speech differ.
  - ASL has a sentence structure that is not commonly used in English.
  - English vocabulary often has multiple meanings. Comprehension of the sentence depends on understanding which meaning to use (ex. The word “make” has over 30 definitions on <http://www.merriam-webster.com/dictionary/make>).
  - Ideas conveyed grammatically accurately in one language may not be accurate in the other language if written in the order and with the vocabulary in the other. These differences and unknown vocabulary cause difficulty with writing and reading for some ASL users.
- It is critical to recognize that **an individual’s difficulty with written English does not indicate low intelligence.**

Grosjean, F. (2010). Bilingualism, biculturalism, and deafness. *International Journal of Bilingual Education and Bilingualism*, 13 (2), 133-145.

Ann, J. (2001). Bilingualism and Language Contact. In C. Lucas (Ed.), *The Sociolinguistics of Sign Languages* (33-60). Cambridge: Cambridge University Press.

## CONSIDERING APPROPRIATE PROVISION OF SERVICES

Interpreting services are provided at VR's expense whenever needed regardless of the *results of financial participation analysis*.

The following options may be utilized by VR to assure that qualified interpreters are available for persons with hearing loss:

- Utilize available staff interpreters.
- Purchase interpreting services from vendor interpreters on an as-needed basis with prior authorization (for individual services) or from the area's budget (for staff and non-individual related).
- Call through video relay service (VRS) interpreters to convey basic information by telephone (e.g. appointment times, directions, and check-in calls).
  - According to the Federal Communication Commission, it is illegal to use VRS for interpreting services if both parties are in the same room.
  - VRS is not recommended as an option to provide counseling and guidance over the phone for many reasons. One example is that VRS interpreters may not meet VR's minimum standard for interpreters.

### USING A QUALIFIED REGISTERED INTERPRETER

VR and individuals utilizing vendor interpreting services have the right to expect competent, dependable service from a qualified interpreter who adheres to the Registry of Interpreters for the Deaf (RID) Code of Professional Conduct. To review the Code of Professional Conduct, visit [www.rid.org](http://www.rid.org).

The Division has adopted the following credentials as acceptable for an individual to become a VR vendor of interpreting services:

- RID NIC, NIC Advanced, NIC Master
- RID/NAD III, NAD IV, NAD V
- RID CI/CT, IT/IC, CSC, MSCS
- RID RSC, CDI
- RID Education K12; EIPA 4.0+ (with special permission\*)
- Florida Registry of Interpreters for the Deaf (FRID) QA I, II, or III

See *Appendix A: Terminology under Organizations and Credentials* for more information on the meanings of these credentials.

- \* An Interpreter with an RID Education K-12 certification or (Educational Interpreter Performance Assessment) EIPA 4.0+ **MAY** be eligible to become a vendor based on the classroom stimulus used in testing. More information on RID Education K12 can be found in Appendix A under EIPA.

- In order to monitor the qualifications of the interpreters provided for an individual, VR vendors are encouraged to identify their credential level on the billing invoices for each assignment. This is particularly important when an interpreting agency is used to provide services. All agency vendor invoices should list the name and credential of the interpreter who is sent on VR purchased assignments.
- The credentials listed above shall be used for all interpreting needs unless special circumstances warrant the use of other individuals acting as interpreters. Arranging for interpreters who are not VR vendors and do not have appropriate credentials under very special circumstances will only occur after consulting with and obtaining approval by VR Deaf, Hard of Hearing, and Deaf-Blind Services staff. These persons MAY be determined to be eligible for Temporary Vendor Status [page. 31]

Interpreters who have questions regarding the qualifications for becoming a VR are encouraged to contact the VR Deaf, Hard of Hearing, and Deaf-Blind Services staff at DVR headquarters. Contact information is located under Statewide Technical Assistance on page 37.

**Procedure to Register as a VR Vendor Interpreter  
or Vendor Interpreting Agency**

1. **Register with My Florida Market Place** as a state of Florida vendor through:  
[http://www.dms.myflorida.com/egovernment\\_tools/myfloridamarketplace](http://www.dms.myflorida.com/egovernment_tools/myfloridamarketplace)
2. **Complete the electronic Substitute Form W-9** with the Department of Financial Services through <https://flvendor.myfloridacfo.com/>.
3. **Complete the appropriate VR Vendor Application** located on  
[http://rehabworks.org/vendor\\_apps\\_forms.shtml](http://rehabworks.org/vendor_apps_forms.shtml).
  - a. **Individual interpreters** should complete the VR Standard Vendor application and attach a copy of a current membership card showing credential level
  - b. **Interpreting agencies** are to complete the VR Group Sign Language Interpreter Vendor application and have the Group Attestation notarized.
4. **Fax or email the appropriate application** to the VR Vendor Registration Unit. Fax: (850) 245-3394 or  
Email: [VRVendors@vr.fldoe.org](mailto:VRVendors@vr.fldoe.org).
5. **Call or email the VR Vendor Registration Unit with questions or to confirm receipt of the application** at 866-580-7438 or 850-245-3401 or [VRVendors@vr.fldoe.org](mailto:VRVendors@vr.fldoe.org).

### HIRING A TEAM OF TWO INTERPRETERS

The following is based on a national professional standard and will be observed for both staff interpreters and vendor interpreters.

- Team interpreting may be **considered for any assignment that exceeds one hour and is expected for any assignment that is two hours or longer of ongoing interpreting**. For presentations and meetings that are expected to be fast paced or that contain highly dense materials lasting longer than an hour, a team of interpreters may be necessary.
- All assignments of an hour or more will be analyzed, confirmed, and determined prior to hiring the interpreter(s). For an assignment that may be lengthy in duration but does not require non-stop interpreting, such as licensure exams or hands-on training, one interpreter may be sufficient. The decision to hire only one interpreter will be communicated to the secured interpreter prior to confirmation of the assignment.
- Team interpreting may consist of two sign language interpreters working together on the same assignment. This technique is required to maintain the quality and effectiveness of the interpreting product. They alternate interpreting approximately every 20 minutes. The interpreter who is not interpreting uses the time to coordinate signed concepts, monitor the working interpreter for accuracy, feed missing information, and utilize other cues in the interpreting process to ensure consistency and accuracy of the information.
- Using two alternating interpreters helps to avoid the risk of fatigue, errors in interpretation, and/or repetitive motion injury. For more information on Team Interpreting and on Interpreters Avoiding Repetitive Motion Injury, see [http://rid.org/UserFiles/File/pdfs/Standard\\_Practice\\_Papers/Drafts\\_June\\_2006/Self-Care\\_SPP.pdf](http://rid.org/UserFiles/File/pdfs/Standard_Practice_Papers/Drafts_June_2006/Self-Care_SPP.pdf) and [http://www.rid.org/userfiles/File/pdfs/Standard\\_Practice\\_Papers/Team\\_Interpreting\\_SPP.pdf](http://www.rid.org/userfiles/File/pdfs/Standard_Practice_Papers/Team_Interpreting_SPP.pdf).
- Unique interpreting teams may consist of a spoken and a sign language interpreter or a Deaf interpreter and a hearing sign language interpreter. These specialized teams are to assist with individuals with non-standard communication requirements. For more information on teams of deaf interpreters and hearing interpreters, see Specialty Interpreting Services on page 13-15.
- Each interpreter shall be paid in accordance with his or her credential and skill, as negotiated and agreed upon in advance, for the full assignment duration.

### HIRING INTERPRETERS WHO ARE REMOTE

Technology exists for interpreters to be secured who are not physically present to interpret live in a meeting; this technology is commonly called Video Remote Interpreting [VRI]. In this technology, the interpreter will be seen over computer monitors and mobile devices.

The services of these Video Remote Interpreters (VRIs) are purchased by the minute from companies who may also be vendor agencies for live interpreters. This technology is not widely available, but is becoming more prevalent. This service may, in some cases, be an option to discuss with employers for post-closure access to interpreters as well as an option for VR offices in the future. For more information, contact the Deaf, Hard of Hearing, and Deaf-Blind Services program.

### **DUAL CASES INVOLVING DIVISION OF BLIND SERVICES**

When VR staff contacts the staff from the Division of Blind Services (DBS) for potential dual cases of individuals who are deaf-blind, VR will provide interpreters in the first meeting when representatives from both agencies meet with the individual to determine how the representatives will coordinate the case.

Both agencies will determine expectations and responsibilities for the provision of accommodations. VR should be responsible for interpreter provision for any VR service-related meetings. DBS should be responsible for interpreter provision for any DBS service-related meetings. The actual arrangements of accommodations will be determined based on the individual's needs and available resources.

VR can be expected to offer guidance and information to the DBS staff when necessary to ensure effective communication between the agencies' staff, the individual, and other parties and providers.

For more information, consult the Memorandum of Agreement (MOA) between Two Divisions in the Department of Education: The Division of Blind Services and The Division of Vocational Rehabilitation. For a copy, either contact Deaf, Hard of Hearing, and Deaf-Blind Services or find a copy is located on the Field Services Main Page of the VRiNet under Interagency Agreements. The document is listed as Division of Blind Services.

### **LISTING OF SPECIALTY INTERPRETING SERVICES**

Some individuals with hearing loss will have special needs in regard to interpreting services. If an individual requests specialized interpreting services, VR shall make every attempt to find an interpreter with the required skills. Some examples of specialized interpreting are:

- TACTILE INTERPRETING for individual who are deaf-blind. Appointments of an hour requiring tactile interpreting will require a team of interpreters. These interpreters must be familiar with the variety of tactile interpreting techniques, be comfortable with

working in physical contact with the individuals including the need to reframe from perfumes, and must understand the dynamics of conveying sign language non-visually. All efforts will be made to ascertain specifics of the type of interpreting needed by the individual so the interpreters can determine if they can provide the service adequately.

- CLOSE VISION INTERPRETING for individuals who have limited vision and use sign language. Appointments of an hour will likely require a team of interpreters. Individuals needing this type of interpreter often require the interpreters to wear or avoid certain colors, to avoid certain distracting visual backgrounds, to refrain from perfumes, and to be comfortable with sitting in close proximity. All efforts will be made to identify the individual's needs before providing these services so the interpreters can determine if they can provide the service adequately.
- ORAL INTERPRETING for individuals who are deaf and rely on speech reading to understand and to participate in conversation. This individual does not know sign language very well or at all. RID has specific certifications for this type of interpreting. Some sign language interpreters who are VR vendor interpreters have this skill although they may not have the credential. However, some sign language interpreters are ill-equipped to provide this service. When an individual needs an oral interpreter, the request will be clearly stated that this is the service needed so the interpreters can determine if they can provide the service adequately.
- HIGH VISUAL INTERPRETING for individuals who are deaf and "at risk" who:
  - Do not use a standard sign language due to being under-educated or multi-disabled.
  - Only use a foreign sign language for which VR does not have an interpreter skilled in that language.

A high visual interpreter uses unique interpreting techniques to communicate with the person who is deaf. High visual interpreting situations may require a team of interpreters consisting of a hearing interpreter (either staff or vendor) and a deaf interpreter who is likely credentialed as a Certified Deaf Interpreter (CDI) or a RSC (Reverse Skills Certificate). These professionals will work together in an attempt to communicate with the individual who is deaf. [For more information on the use of interpreters with CDI or RSC credentials, see [http://rid.org/UserFiles/File/pdfs/Standard\\_Practice\\_Papers/CDISPP.pdf](http://rid.org/UserFiles/File/pdfs/Standard_Practice_Papers/CDISPP.pdf) and page 12.

For more details regarding any of these specialized interpreting skills, please consult with your area staff interpreter, with Deaf, Hard of Hearing, and Deaf-Blind Services offices at VR headquarters, or on the national organization website, [www.rid.org](http://www.rid.org).

ACCOMMODATING INDIVIDUALS WHO REQUIRE FOREIGN SIGN LANGUAGE

Individuals applying for services who are deaf and lack ASL skills but know a foreign sign language will require VR to provide special arrangements to provide communication access. Providing special interpreting services for this population will satisfy VR's responsibilities to give access to qualified interpreters as outlined in the annual VR State Plan. The needs of each case are determined by the individual's competence in a foreign sign language, his/her familiarity with ASL, and his/her competence in the written or spoken language of his or her home country.

Counselors need to be aware that in various countries, there are distinctly different sign languages that do not parallel similar spoken languages. For example, the sign language used in Mexico may not be understood by a sign language user from Cuba or Peru.

Some possible considerations for providing communication access for this population are as follows:

- Some VR vendor interpreters may also be knowledgeable in a foreign sign language, such as Cuban Sign Language, Vietnamese Sign Language, or Mexican Sign Language. VR staff members who work with the vendor interpreters in the area are to maintain a list of vendors who are also skilled in a foreign sign language. If no interpreter has this skill set, attempt to locate a "high visual communication" interpreter.
- If no VR vendor interpreter knows the foreign sign language needed for this individual, VR staff shall ascertain if any local VR vendor interpreters are skilled in "high visual communication" (techniques that use a mixture of non-standard and standard sign, iconic gesturing, drawing, and writing to communicate). For more information on this type of interpreting, see above in Specialty Interpreting Services page 12-14.
- If no hearing vendor interpreter skilled in working with individuals with limited ASL or language skills is available, a team of interpreters consisting of a hearing interpreter and a vendor interpreter who has either a CDI or a RSC credential will work together in an attempt to communicate with the individual who is deaf. [For more information on use of interpreters with a CDI or RSC, see [http://rid.org/UserFiles/File/pdfs/Standard\\_Practice\\_Papers/CDISPP.pdf](http://rid.org/UserFiles/File/pdfs/Standard_Practice_Papers/CDISPP.pdf)]
- If there is a clear indication from a person familiar with the individual who is deaf that he/she is literate in reading and/or speech-reading in a foreign spoken language, a team consisting of a spoken language interpreter who will translate into print and/or speech and a sign language interpreter who will present information in basic high visual mode should be arranged to work together to facilitate communication.
- If a non-credentialed interpreter with the necessary skills to communicate with this individual is available, consultation should be sought with Deaf, Hard of Hearing, and Deaf-Blind Services to determine if this interpreter shall be allowed to provide services. This service provider may be approved as a Critical Need interpreter to provide such

services on a temporary basis. More information on Temporary Vendor Status can be found in on page 31.

- If all other options have been exhausted and not one qualified interpreter can be found who can communicate with this individual, and there is a stakeholder without interpreting competency that can communicate with the individual, consultation should be sought with the Deaf, Hard of Hearing, and Deaf-Blind Services to determine if this person shall be allowed to provide communication access. Both the consultation and the results of attempts to communicate shall be thoroughly documented in case notes.

In all cases, the Counselor shall be prepared to provide information regarding access to the local Deaf community and a list of resources including local services and online websites to develop the individual's ASL skills.

### **PROVIDING ACCOMMODATIONS IN REFERRAL STATUS**

All individuals with hearing loss referred for VR services will receive services from qualified interpreters for the preliminary assessment or orientation. Authorizations for VR services cannot be generated until the individual has completed the VR application process. In this situation, there are a few options to consider:

- If a staff interpreter serves the area and is available, make every attempt to schedule initial interviews with these staff members. If this cannot be done in a timely manner, go to the next step.
- If a vendor interpreter is hired, attempt to schedule multiple (i.e. two or more) individual appointments on the same day. You can generate an authorization with funds encumbered under the name of an eligible individual with several appointments scheduled back to back for the time requested. Once the individual applying for services signs and can be placed into Applicant status, cancel this authorization and generate two new authorizations for services that indicate the appropriate division of units between the two individuals. [NOTE: This may mean the appearance fee is split, and half appears on each authorization.]
- If only a single appointment is secured for an initial interview, the vendor interpreter may require a VR commitment for the assignment. The vendor interpreter may accept an emailed confirmation of the assignment, which can also serve as a letter of commitment for receiving payment to secure services for the appointment.
  - Once the individual signs the application and is moved into Applicant status, generate the authorization for the appointment as quickly as possible and, if possible, on the same day as the status change to avoid an "after the fact" authorization.

- If the individual does not appear for the appointment or does not choose to sign the application to become an applicant, the interpreter's invoice shall be paid promptly. This payment shall be arranged either:
  - a. Using an "after the fact purchase order" complying with all procedures as outlined by DMS Purchase Order terms and conditions, or
  - b. Through an established blanket purchase order (see bullet below).
- If a particular office believes that requests for interpreting services in Referral Status will happen often within a fiscal year, the office may opt to create a blanket/term purchase order to cover these services within the unit or area.

## SCHEDULING INTERPRETERS FOR APPOINTMENTS

### COORDINATING INTERPRETERS

Each unit supervisor will determine who will be responsible for scheduling interpreters. The coordination of interpreters will be based on available staff expertise in handling communication and interpreting services for individuals with hearing loss, and may include:

- The staff interpreter coordinating unit assignments (where available).
- Designated counselor(s) or support staff member(s) knowledgeable in methods of determining appropriate vendors to meet unique language needs of this population. For guidance and training, this person can consult with Deaf, Hard of Hearing, and Deaf-Blind Services. Contact information is located under Statewide Technical Assistance on page 37.

If there is a staff interpreter available to the local office where another staff member is assigned to coordinate interpreting services, the staff interpreter and designated staff **shall schedule interpreters jointly for upcoming assignments and hire vendor interpreters if needed.**

SCHEDULING WITH A STAFF INTERPRETER

- Good communication and coordination will ensure appropriate and efficient use of the professional staff interpreter.
- Staff Interpreter's Daily and Weekly Schedule
  - Staff Interpreters who are Career Service employees (FTE) of the State of Florida comply with the Attendance and Leave Rules as outlined in 60L-34 of the Florida Administrative Code (F.A.C.).
  - The Staff Interpreter position is designed for the standard business work-week with all official state holidays observed.
  - Staff Interpreters who are contracted staff follow the same daily and weekly schedules as the Career Service Staff Interpreters.
  - Assignments outside of the established permanent work schedule (evening, weekend, and holiday) may be offered to the Staff Interpreters who may accept or decline based upon their availability.
  - All State of Florida Personnel Rules are to be followed for State of Florida employees, including the Fair Labor Standard Act (FLSA), as appropriate.
- Considerations when Scheduling the Staff Interpreter
  - Staff Interpreters work with a multiple counselors, often in a multiple units, and out of the office in multiple locations. When scheduling appointments in more than one location, consideration needs to be given to the scheduling of **lunch time and reasonable drive time** to and from locations.
    - When scheduling transit time keep in mind the time that interpreters must include many activities before being ready to provide the next interpreting assignment. Often an interpreter must sign out of VR office location, drive to the new location, find parking, locate the office/establishment for the meeting, notify relevant staff in the external facility of the interpreter's arrival, locate the VR individual who needs interpreting, secure any relevant, last-minute preparation material and be ready to interpret on time.
    - In order to accommodate common situations like traffic as well as the responsibilities listed above, interpreters often build in up to double the standard travel time for a new location plus an industry standard of an additional 15 – 20 minutes from parking lot to appointment in order to be ready on time for the meeting.
    - Example scenario with reasonable travel time:

- An individual with hearing loss has an appointment in the VR office from 11 am – 12 pm and another individual with hearing loss needs an appointment that afternoon in the field.
- The location of the external appointment is 20 map miles from the office.
- Scheduling considerations:
  - The staff interpreter has 60 minutes for lunch.
  - Regardless of computerized estimated travel time, a distance of 20 miles may include traffic so 40 minutes would be reasonable driving time.
  - In addition, the interpreter needs 15-20 minutes to park, get into a known location, check in with the facility contact person, locate the VR individual needing the services, and have a few minutes to prepare to interpret.
- In this scenario,
  - 12:00 pm plus 60 min lunch = 1:00 pm
  - 1:00 pm plus 40 min transit time = 1:40 pm
  - 1:40 pm plus 20 min preparation time = 2:00 pm
  - The earliest, reasonable time for the appointment would be 2:00 pm.
- **Consult with the Staff Interpreter to determine the needed time between locations and appointments for successful transit and his/her scheduled lunch period.** The Staff Interpreters have experience in negotiating transit time, daily traffic areas of concern in the area, whether he/she knows the area and the facility for the appointment, and can discuss challenging schedule situations as they arise.
- Considerations for Not Scheduling the Staff Interpreter
  - **Specialized Communication Needs** - A Staff Interpreter may indicate that a particular individual has a linguistic need that cannot be satisfied by the Staff Interpreter. This will be noted and every effort will be made to find an interpreter with the skill set necessary to provide effective communication.
  - **Credential or Specialty Requirement** – Some Staff Interpreters may not have a particular credential that allows him/her to provide the requested service. Staff Interpreters can be hired with a Florida Quality Assurance (QA) level II. Some assignments require a higher proven skill. For example, interpreters with state credential may not provide interpreting for psychological assessments or mental health.
  - **Conflict of Interest** - If a Staff Interpreter believes there is a conflict of interest in providing services to a particular individual, it will be noted and every effort will be made to find a substitute interpreter.

- **Professional Ethics** – Because of the Professional Code of Conduct that all professional interpreters comply with, Staff Interpreters may decline an assignment when he/she cannot ethically provide high quality interpreting because of the subject matter, communication needs, or individuals involved.

- Scheduling for two simultaneous appointments when a Staff Interpreter is available

When two appointments are scheduled at the same time in which both require interpreting services, consult with the staff interpreter to determine which appointment should be scheduled with the staff interpreter. The second appointment will be covered by a vendor interpreter.

As an example, if a job interview is scheduled for one individual at the same time as an audiological evaluation for another, determine the level of risk/value to the case. The job interview is considered high value because it may lead to both employment and a successful closure, so it will be likely the staff interpreter will determine that he/she should handle the interview. The audiological evaluation is of lower risk to the successful placement of an individual and should be scheduled with a vendor interpreter.

- Setting appointments in order to only use the staff interpreter

If the staff/contract interpreter's schedule is in conflict with a scheduling need, individual services will not be delayed due to the staff interpreter's unavailability; alternate arrangements will be made to ensure that individual services are not unreasonably interrupted or delayed.

A delayed or interrupted appointment is one in which the individual with hearing loss waits more than a few days longer than his/her peer who does not have a hearing loss for the same type of appointment. In order to minimize interruptions and delays, hire a vendor interpreter for necessary assignments. Cost and distance should not prevent the vendor interpreter's hire when a decision to not arrange for the vendor interpreter would delay the services needlessly.

General Tips to Best Match an Interpreter to an Individual's Linguistic Needs

1. The designated staff member will compile information on the commonly used vendor interpreters to include specialized skill sets and travel radii [distance willing to travel for assignments].
2. The designated staff member will utilize his or her knowledge about the individual's language skills and needs and his or her knowledge of the vendor interpreters' skill set to make matches that provide most potential for successful communication. For individuals:
  - Are they strong ASL users?
  - Do they depend on speech reading and signs so an oral or a signed English interpreter may be needed?
  - Is their sign usage non-traditional? Are they from a foreign country? Do they have vision or physical issues that impacts language?
  - What is their literacy and practical life experiences?
  - Has any interpreter reported having difficulty understanding this individual? Is it significant enough to warrant the use of a CDI interpreting?
3. Consider the assignment's "risk" level.
  - A "high-risk" assignment would be a job interview for a highly skilled position, psychological evaluation, or unique communication needs of the individual. In these situations, every effort must be made to hire an interpreter with national credentials (such as CI, CT, NAD, NIC) and/or consideration of the use of a CDI
  - A more routine assignment could be signing the IPE, an audiological exam, or a staff meeting for an individual who is stable at work. In these situations, any vendor interpreter would likely be appropriate.
4. Consider if the staff interpreter (if available) can or should interpret the appointment. If not, contact only the vendors who can provide have the appropriate skills needed to meet the needs of the individuals and the identified risk level of the assignment.

SCHEDULING VENDOR INTERPRETERS

If a staff interpreter works with the office, to the extent possible, the staff interpreter and designated VR staff member will jointly match individuals’ linguistic needs with vendor interpreters’ skills and abilities to promote the most effective communication access.

If a staff interpreter does not work with the office, the designated VR staff member assigned to schedule vendor interpreters should contact Deaf, Hard of Hearing, and Deaf-Blind Services staff for guidance and information on arranging services that provide effective communication. Some individuals have unique language needs, and these needs must be addressed in order to appropriately match interpreters for most assignments.

An Important Note on Confirmed Appointments with an Interpreter

The profession of interpreting has a standard called *appearance fee*. *Appearance fee* is a term defined in on page 5, and the payment processes are described on page 33. Regardless of the appearance fee, appointments have confirmed start and stop times to represent the commitment that the interpreter has agreed to fulfill. The interpreter is committing to interpret for the total confirmed appointment time with VR, not for the length of time that equals the appearance fee.

*For Example:* In a scenario where an appointment was confirmed from Monday at 9 am – 10 a.m., find below some of the possible issues that can occur. An authorization is generated for the professional appearance fee for the interpreter.

<b>Vendor Scheduling Scenarios</b>	
If an appointment is delayed and will not end at the expected time (e.g. will not begin until 9:30 a.m.).	The interpreter needs to be asked if he/she can stay beyond the scheduled 10 a.m. However, the interpreter may need to leave the assignment at the end of the confirmed appointment time (e.g. 10 a.m.) regardless of the completion of the appointment and can invoice for his/her appearance fee. If the interpreter is able to wait for the late appointment, the interpreter will invoice for the entire time spent at VR and may need a new authorization generated.
If the assignment completes before the end of the agreed time and there are no other appointments scheduled.	The interpreter can leave when the assignment is declared over. For appointments for which the <b>individual fails to appear</b> , interpreters may leave when the individual or hearing customer is declared a “no show”, the standard is typically a wait of 20-30 minutes. VR should ask for the vendor interpreter’s “no show” policy when confirming arrangements. The interpreter can invoice for his/her appearance fee.

<p>If the request is intended to include the interpreter being available for another appointment or for general walk-in duties.</p>	<p>The interpreter needs to be aware and agree to these conditions at the time the interpreter is scheduled. Interpreters have a <b>Code of Professional Conduct</b> that requires the interpreter to accept assignments based on an assumption of <b>no conflict of interest</b> and other standards. In order to avoid these situations, interpreters will require information such as names and situations for each assignment. An interpreter who accepts a “walk-in” assignment understands the implications of possible conflict-of-interest or other potential issues.</p>
<p>If an individual does not appear and a VR staff member, who is deaf, wants to use the interpreter’s services to communicate with other staff members.</p>	<p>Ask the interpreter if this change is acceptable. If the interpreter agrees to the change, the authorization will be cancelled.</p> <p>The interpreter will be paid by either by:</p> <ul style="list-style-type: none"> <li>• a blanket purchase order for employee accommodations (if any)</li> </ul> <p>Or</p> <ul style="list-style-type: none"> <li>• An after-the-fact purchase order</li> </ul> <p>If the interpreter does not agree to interpret for the staff member, the original authorization for individual services will be processed for payment as an individual “no show. “</p>

MAINTAINING CONFIDENTIALITY WHILE COORDINATING INTERPRETERS

In order to maintain confidentiality to the full extent possible, the vendor will be given only minimal information before accepting the assignment. The information provided will include:

- Date and time.
- General geographic location.
- Specific type of assignment (e.g. employment, training, medical, mental health, evaluation).
- Any unique communication needs that are relevant (tactile interpreting, low vision, oral, or high visual)

FINALIZING CONFIRMATION FOR SERVICES

Once the vendor interpreter has accepted the interpreting assignment, more details can be shared, including:

- Names of the deaf and hearing participants.
- Exact address of the assignment.

- Information relevant to processing the authorization.
- If the assignment is a training or meeting, details shall be provided so that the interpreter can prepare for the assignment. Preparation materials may include, but not limited to, agendas, PowerPoint, handouts, as well as contact information for the person handles material distribution for follow up.

NOTE: Be sure to verify the interpreter/agency's policies for cancellation and consequences of either customer's failure to appear ("no show") when confirming the appointment.

If the interpreter is scheduled through an interpreter service agency, the staff member will:

- Remind the agency of VR's acceptable credentials (list on page 10).
- Emphasize the need for securing interpreters with credentials that adequately service for assignment "risk" value as discussed in on page 21.
- Require the interpreter service agency to provide the name and credential of the assigned interpreter before the assignment.
- Remind the interpreter service agency to list the interpreter and credential on the invoice for payment.

When an appointment is finalized, the staff member will follow the guidelines in Section IV, Vendor Interpreter Payment Procedures to process payments.

#### HANDLING WRITTEN AND PHONE REQUESTS FOR INTERPRETING SERVICES

Secure an interpreter as quickly as possible so as not to unnecessarily delay the appointment. If the staff interpreter's schedule is in conflict, vendor interpreter(s) will be hired.

It is good practice to inform individuals that interpreter requests will need to be made at least 48 hours (with an understanding that the more time provided to secure services, the better) prior to a scheduled meeting to allow time to secure services.

If a VR staff member receives a written, email, and/or phone request for an interpreter, VR will provide an interpreter or reschedule the meeting to a date and time when such an accommodation can be made.

#### HANDLING WALK-INS OF INDIVIDUALS WHO NEED INTERPRETING SERVICES

If an individual arrives at an office without a scheduled appointment and needs interpreting services, the office will make every effort to locate an interpreter (whether it is staff or vendor interpreter) at that time. If an interpreter is not available for an immediate appointment, give the individual the opportunity to return for an appointment at his/her convenience. It is important to allow for sufficient time to schedule an interpreter. Make a firm appointment for the individual to return in accordance with the instructions in securing an interpreter as described in the preceding paragraphs.

### HANDLING UNEXPECTED REQUESTS FOR INTERPRETING SERVICES

VR recognizes that certain situations requiring interpreting services can be unexpected and occur without prior notice. Examples include emergency doctor visits related to VR sponsored medical treatment, job interviews, or employee/employer meetings over a reprimand. These events will not be unnecessarily delayed.

If a staff interpreter works within the unit with individuals, every attempt will be made to have this person provide this service. If there is no staff interpreter or the interpreter's appointments cannot be altered, every effort will be made to satisfy this unexpected, last minute request, including hiring a vendor interpreter.

If an available vendor interpreter is located, it is to be expected that a "last minute" or "emergency" fee may be added to either the appearance fee or hourly rate. This situation may also necessitate an authorization generated after the date the service was rendered. Creation of this "after the fact" authorization requires a case note with a clear justification with the time line of events.

### CONSULTING IN COMPLICATED CASES

Staff members who have the responsibility of scheduling interpreters are strongly encouraged to consult with relevant staff such as a staff interpreter, other VR personnel (e.g. counselors or consultants) who serve individuals with hearing loss, or Deaf, Hard of Hearing, and Deaf-Blind Services for assistance with complicated cases.

Assistance may include considering alternatives to scheduling conflicts, hiring vendor interpreters, and providing technical assistance on communication issues in order to ensure that qualified interpreters and quality services are provided to match an individual's specific interpreting needs.

## **ENSURING AN INDIVIDUAL'S RIGHTS**

### NOTIFYING THE INDIVIDUAL

It is the responsibility of VR staff to notify the individual with a hearing loss of his or her right to a qualified interpreter (see definition on page 5). If the individual is accompanied by someone who is interpreting for him or her, the notification will be made through the companion or by any other reasonably available method of communication (writing, typing, etc.). Additional information that should be provided to the individual includes the following:

- All individuals have the right to a qualified interpreter in any interaction with VR staff.
- VR will locate and provide a qualified interpreter.
- There is no charge to the individual for the qualified interpreter's service.
- All VR activities will be scheduled at a date and time during which a qualified interpreter will be present.
- The process the individual should use to request the services through the VR office

All persons have a right to file a complaint if they believe they have been treated unfairly or if they believe their right to effective communication has been violated.

NOTE: If information is interpreted to the individual through a non-VR-provided “interpreter”, the individual is required to sign the Client’s Waiver of Confidentiality Rights as referenced in Counselor Policy Manual 2.03(1)B. This waiver will be retained in the individual’s file. After the appointment,, enter a case note outlining how the information was conveyed.

#### INDIVIDUAL’S INFORMED CHOICE FOR INTERPRETERS

- If the individual requests to use a specific interpreter who is on staff or is a vendor, every attempt will be made to first secure this interpreter if there is no conflict of interest (such as familial relation).
- If an individual requests not to use a specific interpreter and there is an available pool of other qualified interpreters to choose from, every effort will be made to honor this declaration of informed choice.
- If an individual requests to use a specific interpreter who is not a vendor but who could otherwise qualify as a vendor (e.g. current credentials and state or national organizational membership and compliance with Code of Professional Conduct), the VR staff will discuss the possibility of the community interpreter becoming a vendor. More information on the Vendor Registration process is available on [www.rehabworks.org](http://www.rehabworks.org) under Vendor Information.
- If an individual requests to use a specific interpreter who is not a vendor and cannot become a vendor (e.g. lacks appropriate credentials or membership), the individual will sign the Client’s Waiver of Confidentiality Rights as referenced in Counselor Policy Manual 2.03(1)b. Retain this waiver in the individual’s file.

#### DOCUMENTING IN CASE NOTES WHEN AN INDIVIDUAL DECLINES INTERPRETING SERVICES

During any appointment in which an individual with a hearing loss does not wish to use the services of a qualified interpreter as provided by VR, the Counselor is required to enter a case note that records the following:

- The individual’s primary mode of communication.
- The service of a VR-provided, qualified interpreter was offered.
- The individual declined such services.

If the individual requests to use his/her friend or family member as the interpreter, the counselor will require that the individual sign a Client’s Waiver of Confidentiality Rights form and will inform the individual that

- VR will not be responsible for any miscommunication due to inaccurate interpretation
- VR will not pay for services arranged by the individual.

This discussion will be documented in detail in the case note.

**DOCUMENTING IN CASE NOTES WHEN INTERPRETING SERVICES ARE NOT AVAILABLE**

If an individual with hearing loss requests services of a qualified interpreter but no interpreter is available, record the following in the case note:

- The individual's primary mode of communication.
- If a qualified interpreter was not available, what other alternative means were considered.
- The individual's decision and how both parties proceeded with the decision making process.
- The alternative communication method provided (if individual agreed).

If the individual suggests a person to interpret who is not a VR vendor but has the skill and whose involvement does not pose a conflict of interest, the VR staff must contact the Deaf, Hard of Hearing, and Deaf-Blind Services for guidance. All discussions and decisions regarding services provision will be documented in detail in the case note.

**DOCUMENTING IN CASE NOTES HOW COMMUNICATION OCCURRED**

The case note will describe the type of communication used, such as the following:

- A phone call as through Video Relay Services (VRS).
- An interpreter present during the appointment (list the interpreter if a vendor by name and credential).
- A walk-in meeting during which the counselor and individual chose to write because no interpreter was available.

Counselors will document in the case notes any decisions about providing or not providing services. These case notes will give detail regarding the steps that were taken to ensure effective communication.

**DOCUMENTING IN CASE NOTES AND INTERPRETER CONFIDENTIALITY**

VR staff interpreters are members of the rehabilitation team. If a staff interpreter (working in a non-interpreter role) acquires critical information that impacts the progress of the rehabilitation case, the staff interpreter shall either:

- document the information in case note, or
- inform the VR counselor (who will document such information in the case note)

Relevant information may come up while the staff interpreter interacts with the individual(s) prior to or after interpreting activities or while coordinating appointments. Examples of critical information may include:

- the individual is working, but this is not documented in the case file, or
- the individual has undisclosed health issues that may affect the rehabilitation progress.

**Interpreters follow a strict code of confidentiality while interpreting.** It is illustrated in the national Registry of Interpreter for the Deaf (RID)'s RID's Code of Professional Conduct [www.rid.org/ethics]. However, an exception to this confidentiality code is found in the VR Employee policies of Confidentiality and Disclosure. (Reference CPM Chapter 2)

The vendor interpreters have no obligation to disclose any information outside the information required for billing and producing the invoice.

## VR PROCUREMENT FOR VENDOR INTERPRETERS

### UNDERSTANDING THE RIMS VENDOR DIRECTORY SCREENS

#### TYPES OF INTERPRETERS FOR THE DEAF VENDORS

- Individual Interpreters (listed as *Certified* in the **Certified Status** column). Vendors in this category possess at least one of the appropriate credentials for VR to interpret for individuals and have completed the appropriate VR Vendor application.
- Interpreting Agencies (listed as *Certified Group* in the **Certified Status** column). Vendors in this category have completed a VR Vendor Unit Group Sign Language application and submitted a notarized Attestation that all interpreters secured for VR appointments will have the appropriate credentials.
  - If using an interpreter agency, VR staff will remind the agency during the initial contact that the interpreter being assigned for an appointment must possess one of the credentials that VR requires.
  - When the interpreter service agency confirms assignment of an interpreter to the appointment, the VR staff will receive the name and credentials of the interpreter being used for VR assignments.
- The use of the word "Certified" in this column shows that the entity has completed the registration process, but it **does not** indicate the level of competence proven on the interpreting tests.

#### IDENTIFICATION OF VENDOR INTERPRETER SKILL LEVEL

In order for VR staff to identify the vendor interpreter's level of credential, the VR Vendor Registration Unit will list RID or FRID before the License Number. (This procedure began with the July 2012 registration).

- If the **License Number** column indicates a RID number, the individual vendor interpreter is nationally certified and able to handle most VR assignments.
- If the **License Number** column indicates a FRID number, the individual vendor interpreter has passed some level of the state quality assurance testing and can handle some VR assignments.
- If the entries are **without License Numbers** and are listed as a Certified Group under **Certified Status**, they are Interpreting Agencies. The agencies will not have a license number since interpreters with and without credentials may work through the agency. Therefore, VR staff will need to contact the interpreting agency to confirm that the interpreters provided for the assignment possess appropriate credentials as recognized by VR for individual services.

## MANAGING INTERPRETER FOR THE DEAF VENDORS FOR THE AREA OR UNIT

### LIST OF AVAILABLE LOCAL VENDOR INTERPRETERS

It is strongly recommended that each local VR office maintains its own listing of vendor interpreters who provide services in their service delivery area. The listing of interpreter providers will be reviewed annually in September and compared to the RIMS Vendor Directory under Interpreters for the Deaf to ensure that the profile for each of the listed interpreters is current, updated, or corrected, including their credential levels.

In order for interpreting credentials to be current, RID and/or FRID annual membership must be maintained. Membership expires annually for both types of credentials on July 1, so vendors must submit their updated membership status and credentials to the vendor registration unit by that date. In some situations, a grace period may be allowed to secure documentation of current status.

### IDENTIFICATION OF INTERPRETERS WILLING TO TRAVEL

While creating the List of Available Local Vendor Interpreters, it is strongly encouraged that the unit personnel contact all vendors to ascertain the map radius that each vendor is willing to travel. Since sign language vendors may be mobile, the county or city of service delivery area may differ from the mailing address in RIMS.

- Current RIMS database does not indicate the travel radius within which the interpreter may work. The only information available is the county and city of the mailing address. Because of the transient nature of providing interpreting, this does not provide the information needed to determine potential providers for an assignment.

- When the VR staff compiles the working list of interpreters for the service area and if there is a limited number of vendors, VR staff can contact interpreters from neighboring counties to determine other vendor options for the individuals.
- Vendor interpreters willing to travel to neighboring counties are eligible to charge mileage. In order to do that, these interpreters must be listed in RIMS as providing Transportation. This allows for travel costs to be added as a service on the authorization.

Please contact the VR Vendor Registration Unit or Deaf, Hard of Hearing, and Deaf-Blind Services for guidance or more information.

#### PAYMENT CODES TO BE USED FOR SERVICES THAT A VENDOR INTERPRETER PROVIDES

- **Interpreting Services** – Interpreting needs to be referenced on the Individual Plan for Employment in order for vendors to be authorized. General interpreting is identified as G10400 and the post-secondary interpreting is identified as G10401.
- **Mileage and Tolls** - All vendors listed in RIMS as Interpreters for the Deaf will have Transportation listed as a supplemental service in RIMS so that mileage and tolls may be paid should the need arise. Transportation must be listed on the IPE as provided for the interpreter only by Vocational Rehabilitation. On authorizations, Payment Code H20500 is used for mileage and tolls. Mileage is paid at the state approved rate.
- **Lodging, Parking, and Per Diem** – Any vendors listed as Interpreters for the Deaf who will have lodging, parking, and per diem expenses on their invoice will need to have Other Goods and Services listed as a supplemental service in RIMS. In addition, Other Goods and Services must be listed on the IPE as provided for the interpreter only and by Vocational Rehabilitation. On authorizations, code G30200 is used for lodging, parking, and per diem.

NOTE: These expenses should not happen routinely. If these services are needed, you must consult with the Program Administrator for Deaf, Hard of Hearing, and Deaf Blind Services. A note will be forwarded with endorsement to Vendor Registration Unit for inclusion of Other Goods and Services added to the Vendor Registration for a set period of time to complete the need.

Interpreters must present all appropriate documentation of these expenses with the billing invoice to be maintained in the individual's case file.

#### CRITICAL NEED FOR INTERPRETERS/TEMPORARY VENDOR STATUS

A local VR office may experience a severe shortage and/or lack of available and qualified vendor interpreters in its immediate area, including vendors from neighboring counties. The local VR office will make every effort to recruit qualified interpreters in its area who may be interested in becoming VR vendors. If a local office is unable to locate enough qualified vendors

with appropriate credentials who will be available to provide services to the individuals needing interpreting, then the local VR office has a “critical need for interpreters.”

If the office experiences a critical need for interpreters and is able to locate a new interpreter who is qualified, but has not yet received appropriate credentials, this interpreter may be able to receive Temporary Vendor status to provide some interpreting services for VR individuals.

- Situations that could require awarding Temporary Vendor status likely include:
  - An interpreter with credentials from another state or entity
  - A person who completed the necessary training and who has not completed both parts in the credentialing process yet but expects to soon.
  - On rare occasions, other persons whose skill set are specialized for a particular individual’s needs as outlined in on page 15.

In such cases, either a VR staff person or the vendor may directly submit a request for consideration to Deaf, Hard of Hearing, and Deaf-Blind Services Program. The written request will include: a list of any credentials the potential interpreter may possess, current interpreter training records, professional resume, evidence membership with professional organizations, and information on any specialized skill set. It should also include a letter stating that only interpreter credentials are lacking and the interpreter’s plan to obtain acceptable credentials.

After the staff of Deaf, Hard of Hearing, and Deaf-Blind Services receives written documentation verifying the critical need and potential vendor interpreter’s background, the potential vendor interpreter will be contacted and may be required to arrange for web cam or video phone access for a screening with the staff of Deaf, Hard of Hearing, and Deaf-Blind Services.

If appropriate, the VR Program Administrator will forward a recommendation package and approval for temporary status to the Vendor Registration Unit [VRU]. The VRU will award temporary status after receiving this recommendation. If it is determined that the person possesses the knowledge, skills, and abilities necessary to perform satisfactorily as a vendor interpreter for VR and all appropriate steps have been taken, the Division will give the vendor temporary vendor status with the understanding that proper interpreting credentials must be obtained within six months, a year, or other specified time period as determined by the Deaf, Hard of Hearing, and Deaf-Blind Services.

During the approved temporary status period when the interpreter is working to secure a credential, the interpreter may provide services for VR individuals. Invoices and case notes regarding assignments performed by this interpreter shall reference “Interpreter’s name, temporary status.”

If the interpreter works as an individual vendor, the interpreter must meet all requirements as established by DVR to become a vendor [except credential]. In addition, the interpreter must

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register in MyFloridaMarketPlace, provide appropriate W9 documentation, and submit a DVR Vendor application.

If the interpreter works exclusively through a particular vendor agency, the VRU will list the interpreter's name and expiration for temporary status in the Comment box for the agency. The vendor agency will be informed of the temporary status duration and will be notified at the expiration of the temporary status.

The interpreter is expected to inform and provide evidence to the VRU when appropriate credentials are received so the temporary status can be changed to Certified/credentialed in RIMS.

The person awarded temporary status will be expected to know and abide by the Registry of Interpreters for the Deaf (RID) Code of Professional Conduct.

VR may revoke the person's temporary status as a VR vendor interpreter at any time should the person not perform to the expectations of either: the local office; the requesting agency where relevant; or the Deaf, Hard of Hearing, and Deaf-Blind Services Program Administrator.

## VR PAYMENT PROCEDURES FOR INTERPRETING SERVICES

### PAYMENT METHODS

- **Authorizations** - Interpreting services purchased for applicants and eligible individuals of VR as part of an Individual Plan for Employment (IPE) must comply with all procedures as outlined by VR.
- **Blanket/Term Purchase Orders (PO)** - Blanket Purchase Orders are most commonly used when interpreting services are needed as accommodations for VR staff members or members of the public. A purchase order can cover a single service date, an accumulated period of time, or multiple service dates. See *DMS Memorandum No. 3 (2008-09)* under the Purchase Order Method for additional information. Purchase Orders must be completed every fiscal year.
- **Miscellaneous Expenditures** - The Area's budget will pay for the miscellaneous expenditures for services rendered by a contractor for its time and effort.

These types of expenditures are the unexpected acquisition of interpreting services that cannot be paid through:

- an authorization ,or
- the pre-generated blanket/term purchase order

Services not covered by either of these methods will be as an “after-the-fact purchase order”, in accordance with all the procedures outlined by DMS Purchase Order terms and conditions.

### UNITS OF PAYMENT FOR INTERPRETING SERVICES ON A VR AUTHORIZATION

A unit of interpreting services for authorizations is commonly defined as “one hour of service.” For example, an assignment that is scheduled from 9 am – 11:30 am would be authorized for 2.5 units.

Because of the appearance fee discussed below, interpreting assignments are typically expected to be authorized for at least 2.0 units. These units often represent a time equivalent for an interpreter's appearance fee (the minimum payment an interpreter will accept to provide

services). Payments can be authorized and invoiced in ¼ units worked beyond the period of time the vendor identifies to represent the appearance fee.

## BILLING PRACTICES IN THE FIELD OF INTERPRETING

- APPEARANCE FEE (commonly known as “two hour minimum”)- The *appearance fee* is an industry standard that is sometimes called a “two hour minimum,” which indicates a minimum payment for the interpreter to accept the interpreting assignment. Most interpreters determine their appearance fee to be equal to two hours of their hourly rate. Discuss with vendors how much time is considered to be contained in their appearance fee. It is possible for an interpreter to choose a different amount of time to be contained within their appearance fee/minimum request fee. This appearance fee is not reduced for shorter assignments, individual no-shows, or last minute cancellation by either the VR staff or the individual.
- NO-SHOW OR LAST MINUTE CANCELLATION POLICY- If the hearing person or an individual with a hearing loss requiring an interpreter fails to appear for a scheduled appointment or if the appointment is cancelled with less than the agreed cancellation period, VR will be responsible for paying the vendor interpreter for the whole time the service was confirmed prior to the assignment. Typical cancellation policies are 24 - 48 hours. VR staff is expected to verify a vendor’s cancellation policy prior to confirming an assignment request.
- HIRING INTERPRETER(S) FOR UNEXPECTED, LAST-MINUTE ASSIGNMENTS- VR recognizes that certain situations requiring interpreting services can be unexpected and without prior notice. These situations, which are directly related to a successful employment outcome, will not be unnecessarily delayed. Examples may include job interviews and other events that can impact successful placement that are not within VR’s ability to control.

If VR staff is able to secure a vendor interpreter for a last-minute appointment, it is expected that a possible “last minute” or “emergency” fee may be assessed in addition to the appearance fee or hourly rate.

This kind of situation may also necessitate an authorization to be generated after the date of service rendered. Creation of this “after the fact” authorization requires documentation of a case note with a clear explanation of the time line to justify the timeliness.

PAYING INTERPRETER(S) FOR TIME OVER THAT WHICH IS LISTED ON THE

AUTHORIZATION - VR recognizes that authorizations are generated using the best estimate of time needed for the appointment. On occasions, the appointment goes longer than the time allocated on the authorization. In the event that the interpreter can continue interpreting for the customer beyond the scheduled end of the assignment and then invoices for more time than the authorization approves, VR shall pay for the entire duration of time the vendor interpreter was with the customer for the appointment. Methods to address the overage on the authorization are covered in the Field Services Operating Procedures Related to Authorizations under the "Authorization Checklist Tool" found on the VRiNet. The policy outlines that any authorization which is invoiced with appropriate documentation for 10% over the authorization shall be paid. Any invoice that is more than 10% over with appropriate documentation will require either an appending authorization for the remainder of the invoice amount or cancellation of the original authorization and generation of a new authorization and accompanied by appropriate case notes.

- HIRING A TEAM OF TWO INTERPRETERS- According to the national standard in the field of interpreting, assignments that last more than one (1) hour for intense/challenging activity or that last more than two (2) hours of routine activity will require two interpreters. [see page 11].

When two interpreters are hired, each confirms for his or her time in its entirety and will invoice for the time at his or her hourly rate.

If assignments have sufficient "down time" defined roughly as an assignment where half of the scheduled time only requires the interpreter to be on standby, only one interpreter may need to be scheduled. Possible examples include: a vocational or psychological evaluation with hands on activities, certification exams where the interpreter will not consecutively translate written English to sign, or at a trial work placement after orientation. If available, the Staff Interpreter or VR staff familiar with working with individuals who are deaf and hard of hearing should be consulted before scheduling only one interpreter for long assignments.

- MULTIPLE ASSIGNMENTS ON THE SAME DAY AT THE SAME LOCATION- If multiple assignments are arranged in successive order at the same location with the same interpreter beyond 2 hours, each of the assignments will not be billed separately for the 2-hour minimum. Sufficient breaks between assignments are necessary to ensure the ability of the interpreters to continue interpreting effectively. The assignment covers a total of time scheduled to interpret, not the number of different meetings at the same location.

For guidance on these situations, contact your local staff interpreter or the Deaf, Hard of Hearing, and Deaf-Blind Services.

- STANDARDS FOR ASSIGNMENTS THAT LASTS THROUGH A MEAL BREAK-

Upon accepting assignments, Vendor Interpreters schedule the entire time requested for the appointment (i.e. six hours). As a result, VR is responsible to pay for time scheduled including any release time for meals that exists within the assignment duration, if invoiced. If it is a working meal, the interpreter will require “off work” time to be able to eat before being required to work. Because of physical fatigue and repetitive motion concerns, interpreters may choose not to work during meal breaks unless previously scheduled and agreed upon.

Similarly, staff interpreters may be scheduled to work an entire day with a customer. Some of these situations have breaks that allow the interpreter a full meal break (e.g. typical vocational assessments); while other scenarios may not (e.g. typical job orientation). In the job orientation example, the individual may choose to eat in the break room and will likely be approached by co-workers during break. If the interpreter is with the individual during the break, relationships may begin that could develop into natural supports for post-closure.

The staff interpreter will need to assess each assignment to determine the likelihood of having appropriate breaks. If none are evident, the staff interpreter will work to adjust his or her schedule in order to use overtime during the same pay period or under appropriate flex time. Additional information on federal requirement for appropriate breaks during a full work day can be found at [www.dol.gov](http://www.dol.gov). Additional information regarding scheduling and staff interpreters is contained on page 17.

- HOURLY RATE BASED ON AREA STANDARDS- As with the cost of other services, interpreting rates are based on area standards. The rate of payment may vary based on the type of assignments, the specialized skill required, last-minute/on call, and the time and day of the week of the request.

There is currently no statewide, uniform rate for interpreting services. The hourly rate for interpreting services will be negotiated individually with each vendor interpreter. For guidance on acceptable interpreter rates in your area, contact the Deaf, Hard of Hearing, and Deaf-Blind Services.

- MILEAGE, TRAVEL, AND PER DIEM- This information is also on page 29. If there is a lack of available interpreters in the local community and the hired vendor interpreter must travel from a different county for a VR assignment or the vendor interpreter must travel over night for an assignment that lasts several consecutive days, the interpreter may charge mileage and other travel expenses in compliance with the following considerations:

A vendor interpreter traveling outside of his/her county of residence can charge for interpreting services in one of the following options:

- Hourly rate for requested interpreting time (numbers of units listed on the authorization) **plus mileage** at the state rate (listed as a supplemental service on the authorization and the individual's IPE)
- Hourly rate for interpreting **portal to portal**
  - Portal to portal is defined as the interpreter's hourly rate extending from the time leaving the interpreter's residence and the time he/she returns to the residence.
- **An increased hourly rate per unit** for the requested interpreting time (on the authorization) in lieu of travel expenses in unique circumstances.
- **An additional unit added** to the requested interpreting time (on the authorization) in lieu of travel expenses in unique circumstances.

The VR staff must verify the method the interpreter will charge for travel in order to properly generate the authorization or pay the invoice. Vendors may not charge portal to portal and mileage. Supplemental services may need to be added to the RIMS record after recommendations from the Program Administrator of the Deaf, Hard of Hearing, and Deaf-Blind Services.

Interpreters must present all appropriate documentation of these expenses with the billing invoice.

## STATEWIDE TECHNICAL ASSISTANCE

To receive technical assistance concerning all issues covered in this guide as well as other issues related to interpreters and services to individuals with hearing loss, contact Deaf, Hard of Hearing, and Deaf-Blind Services at VR headquarters.

The phone numbers are as follows:

- 850-245-3353 (Voice or VRS)
- 850-298-8818 or 850-270-5325 (VP)
- Toll-free 800-451-4327 (Voice or VRS)

## APPENDIX A - TERMINOLOGY

### PERSON PROVIDING SERVICES

**An Interpreter** is a professional who converts messages from one language to another, conveying all essential elements of meaning and maintaining dynamic equivalence. Interpreting is a highly sophisticated and demanding mental task involving complex cognitive and analytical strategies. Effective interpreting requires competence in two languages (i.e. English and ASL), intelligence, “good” interpersonal skills, rapid mental processing, good working memory, the ability to sustain concentration under stress, ability to monitor quality while working, and excellent predicting and closure skills.

**An Educational Interpreter** is an interpreter who is working in an educational setting typically facilitating communication between hearing teachers, students and administrators, and deaf or hard of hearing students. The educational interpreter may interpret or transliterate [see below] depending on the preferences of the district and the student’s IEP.

**A Transliterater** is a professional who changes a message expressed in one language into a code of the same language. For example, English to Signing Exact English (SEE II), English to Conceptually Accurate Signed English (CASE), English to Cued Speech.

**An Oral Transliterater** is a professional who listens to a spoken English message and then rephrases that message into clearly readable speech voicelessly on the mouth and face using visual and natural gestures. This type of interpreter is used for a deaf individual who uses speech and speech reading as a primary form of communication and who does not use sign language.

**A Signer** is a person who can use manual communication to convey his or her own ideas or can act as a communication facilitator in a one-to-one situation where he or she has control of vocabulary level, speed, and opportunities to expand on the information presented. This person is not qualified to function as an interpreter.

**An Interpreter Intern** is a person who is enrolled in a post-secondary program of study to become a professional interpreter. An intern is supervised by a mentor/lead interpreter who has the requisite credentials to interpret in that setting. An intern may provide services if the individual who is deaf receiving the services approves of the intern in writing as an acceptable interpreter and if the supervising interpreter is present to assist as needed.

## LANGUAGE AND SYSTEMS

**American Sign Language (ASL)** is a visual-gesture language which has its own semantic and grammatical structures and is widely used by deaf people in the U.S. and parts of Canada. ASL is an integral part of Deaf culture.

**Contact Variety Signing** or Pidgin Sign English (PSE) is the result of prolonged language contact between members of different linguistic communities (e.g. English and ASL). These mixture systems include code-switching, code mixing, and lexical borrowing sometimes referred to as Pidgin. This system does not comply with rules of either language (ASL or English).

**Manually Coded English (MCE)** is a variety of English-based signing systems used to represent most of the components of the aural/oral language of English. Includes the Rochester method, Seeing Essential English (SEE I), Signing Exact English (SEE II), Signed English (SE) and Conceptually Accurate Signed English (CASE). Transliterators use these systems in their speech to sign transliterations.

## ORGANIZATIONS AND CREDENTIALS

**Florida Registry of Interpreters for the Deaf (FRID)** is a state-level professional organization for interpreters within the state of Florida. FRID previously oversaw the exams that award state Quality Assurance (QA) and Educational Interpreter Evaluation (EIE) levels.\*\* This screening systems had been used to monitor the progress of non-certified apprentice level interpreters. ([www.fridcentral.org](http://www.fridcentral.org)).

\*\***Quality Assurance Screening (QA)** was an interpreting/transliterating evaluation provided by FRID that assessed skills of persons who work in the community with adults who are deaf or hard of hearing. This screening awarded successful candidates with one of three levels that increase in competence as the number goes up (I, II, and III). These interpreters are considered apprentices in regard to national level certification. FRID has ceased giving the test. Members in good standing may maintain their credential for four years from original award of level. - Interpreters still possessing QA credentials are eligible to work as VR vendors after their submitted application to the VR Vendor Registration unit has been reviewed and approved. QA interpreters are required to adhere to the RID Code of Professional Conduct. QA interpreters may be used in general interpreting settings and post- secondary education settings. Interpreting in legal settings, most mental health situations, and situations of high density or fast pace are not recommended for interpreters holding QA levels. QA levels will all have expired by June 2017.

\*\***Educational Interpreter Evaluation (EIE)** was an exam provided by the Florida Registry of Interpreters for the Deaf (FRID) that assessed manual communication skills specific to interpreters/transliterators in the public school (K-12) setting. The VR Vendor Registration unit does not accept interpreters holding only EIE levels as VR vendor interpreters. All of these credentials will expire in June 2017.

The **Registry of Interpreters for the Deaf, Inc. (RID)** is the national professional organization that provides Manual and Oral Interpreting Certification. The evaluations assess skills for many situations, including community-based interpreting with adults. Credentials are diverse combinations of letters and can be found on the website, [www.rid.org](http://www.rid.org). All interpreters must adhere to the RID Code of Professional Conduct. Grievances against an interpreter's ethics can be filed with RID's Ethical Practices System. VR staff is strongly encouraged to hire vendor interpreters with RID certification for all mental health sessions, complex medical examinations, high stress situations such as vocational assessments and job interviews, and for situations of high density, high risk, or fast-paced information.

The **Educational Interpreter Performance Assessment (EIPA)** is provided by EIPA Diagnostic Center at Boys Town National Research Hospital. More details are available at [www.classroominterpreting.org/eipa/index.asp](http://www.classroominterpreting.org/eipa/index.asp).

- If an interpreter's rating is in the upper range (4.0-5.0), the interpreter may take the Written EIPA test and may also apply to become a certified K12 interpreter through the national Registry of Interpreters for the Deaf (RID). Note: Interpreters with RID Ed K12 credentials may be given permission to become a VR vendor or be used by an agency based on whether the secondary education stimulus was used in testing.
- A score rating in the mid-range (3.0-3.9) indicates entry level interpreting skills for the classroom only and, therefore, would likely not be eligible to become a VR vendor.
- A score rating of 2.9 and below is a diagnostic score only and represents a person who is not recommended to interpret but to dedicate time to a professional development plan of improvement and retest at a later time.

## COMMUNICATION SERVICES USING TECHNOLOGY

The **Florida Relay Service (FRS)** is a telecommunication relay service that can be used by hearing people to make phone calls to individuals who are Deaf, Hard of Hearing, Late Deafened, Deaf-Blind, and Speech impaired who use text devices to communicate. The message is conveyed through print English and spoken word. A relay operator listens to the hearing individual and types what is said to the person texting on the TTY (text-telephone) or IP-relay on the computer. When the individual with a hearing loss or speech impairment types a response, the relay operator reads the message to the hearing person. Florida Relay Service can be reached at these numbers: 711 (Voice/TTY) and **1-877-955-8773** (Spanish). This service is funded through a surcharge on landline telephone bills and is provided as an accommodation for people to have equal access to phone use as referenced in Title IV of the ADA.

**Video Relay Service** is a telecommunication relay service in which the message is conveyed in sign and spoken word through online video connection that is provided for phone communication only. This service is provided in the same way that Florida Relay Service is

provided except that it is provided by online internet video connection. The video relay operator is an interpreter sees the individual signing on a computer screen and hears the other individual talking through a standard phone receiver. All three parties are in separate locations. The individual who is deaf signs to the interpreter via video camera, and the video interpreter then speaks to the hearing individual. When the hearing individual speaks, the interpreter will sign to the individual who is deaf and watching the interpreter on the monitor. This is a service funded under the Federal Communication Commission and is provided as another accommodation for people who use sign language to have equal access to phone use as referenced in Title IV of the ADA.

**Video Remote Interpreting** is interpreting provided through web cam onto a video screen where both the individual who is deaf and the hearing individual are conversing in the same room. This type of interpreting is paid through a contract as a fee-for-service and is most often scheduled in advance. This service can be used if an interpreter cannot be physically available on location.

## APPENDIX B - FEDERAL LEGISLATION REGARDING REASONABLE ACCOMMODATIONS

### AMERICANS WITH DISABILITIES ACT (ADA)

#### Nondiscrimination on the basis of disability in state and local government services

The implementing regulations of the Americans with Disabilities Act (ADA), 28 CFR Part 35 (Subtitle A of Title II), present the following language concerning communications.

#### Subpart E. – Communications

##### 35.160 General

(a) A public entity shall take appropriate steps to ensure that communications with applicants, participants, and members of the public with disabilities are as effective as communications with others.

(b)(1) A public entity shall furnish appropriate auxiliary aids and services where necessary to afford an individual with a disability an equal opportunity to participate in, and enjoy the benefits of, a service, program, or activity conducted by a public entity.

(2) In determining what type of auxiliary aid and service is necessary, a public entity shall give primary consideration to the requests of the individual with disabilities.

For persons who are deaf or hard of hearing, auxiliary aids and services includes - qualified interpreters, note takers, transcription services, written materials, telephone handset amplifiers, assistive listening system, telephones compatible with hearing aids, closed caption decoders, open and closed captioning, telecommunication devices for deaf persons (TDDs), videotext displays, or other effective methods of making aurally delivered materials available to individuals with hearing impairments. (35.104)

##### 35.161 Telecommunication devices for the deaf (TDD's)

Where a public entity communicates by telephone with applicants and beneficiaries, TDD's or equally effective telecommunication systems shall be used to communicate with individuals with impaired hearing or speech.

##### 35.162 Telephone emergency services

Telephone emergency services including 911 services, shall provide direct access to individuals who use TDD's and computer modems.

##### 35.163 Information and signage

(a) A public entity shall ensure that interested persons, including persons with impaired vision or hearing can obtain information as to the existence and location of accessible services, activities, and facilities.

- (b) A public entity shall provide signage at all inaccessible entrances to each of its facilities, directing users to an accessible entrance or to a location at which they can obtain information about accessible facilities. The international symbol for accessibility shall be used at each accessible entrance of a facility.

#### 35.164 Duties

The subpart does not require a public entity to take any action that it can demonstrate would result in a fundamental alteration in the nature of a service, program, or activity or undue financial and administrative burdens. In those circumstances where personnel of the public entity believe that the proposed action would fundamentally alter the service, program, or activity would result in undue financial and administrative burdens, a public entity has the burden of proving that compliance with the subpart would result in such alteration or burdens. The decision that compliance would result in such alteration or burdens must be made by the head of the public entity or his or her designee after considering all resources available for use in the funding and operation of the service, program, or activity and must be accompanied by a written statement of the reasons for reaching that conclusion. If an action required to comply with this subpart would result in such an alteration or such burdens, a public entity shall take any other action that would not result in such an alteration or such burdens but would nevertheless ensure that, to the maximum extent possible, individuals with disabilities receive the benefits or services provided by the public entity.

## REHABILITATION ACT OF 1973: SECTION 504

### Nondiscrimination Under Federal Grants and Programs

Subtitle A of Title II of the Americans with Disabilities Act (ADA) prohibits discrimination on the basis of disability by public entities. It protects qualified individuals with disabilities from discrimination on the basis of disability in the services, programs, or activities of all State and local governments. It extends the prohibition of discrimination in federally assisted programs established in Section 504 of the Rehabilitation Act of 1973 to all activities of State and local governments, including those that do not receive Federal financial assistance. Section 504 is presented here for informational purposes.

SEC. 504 (A) No otherwise qualified individual with handicaps in the United States, as defined in Section 7 (8), shall, solely by reason of his or her handicap, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance or under any program or activity conducted by an Executive agency or by the United States Postal Service. The head of such agency shall promulgate such regulations as may be necessary to carry out the amendments to this section made by the Rehabilitation, Comprehensive Services, and Developmental Disabilities Act of 1978. Copies of any proposed regulation shall be submitted to appropriate authorizing committees or the Congress, and such regulation may take effect no earlier than the thirtieth (30) day after the date of which such regulation is so submitted to such committees.

For the purposes of this section, the term "program or activity" means all of the operations of - -

(1) (A) A department, agency, special purpose district, or other instrumentality of a State or of a local government; or

(B) the entity of such State or local government that distributes such assistance and each such department or agency (and each other State or local government entity) to which the assistance is extended, in the case of assistance to a State or local government;

(2) (A) a college, university, or other post-secondary institution, or a public system of higher education; or

(B) a local educational agency (as defined in section 1471 (12) of the Elementary and Secondary Education Act of 1965), system of vocational education, or other school system;

(3) (A) an entire corporation, partnership, or other private organization, or an entire sole proprietorship.

(i) If assistance is extended to such corporation, partnership, private organization, or sole proprietorship as a whole; or

(ii) which is principally engaged in the business of providing education, health care, housing, social services, or parks and recreation; or

(B) The entire plant or other comparable, geographically separate facility to which Federal financial assistance is extended, in the case of any other corporation, partnership or private organization, or sole proprietorship; or

(4) any other entity which is established by two or more of the entities described in paragraph (1), (2), or (3); any part of which is extended Federal financial assistance.

(C) Small providers are not required by subsection (a) to make significant structural alterations to their existing facilities for the purpose of assuring program accessibility, if alternative means of providing the services are available. The terms used in this subsection shall be construed with reference to the regulations existing on the date of enactment of this subsection.

## APPENDIX C - VR VENDOR PROCESS

Current copies of **VR Standard Vendor Application** and **VR Group Sign Language Interpreter Application and Attestation** can be found on [www.rehabworks.org](http://www.rehabworks.org) in the Vendor Tab under Vendor Applications.



**Vendors**

- New Vendors
  - [Vendor Applications](#)
  - [First Time Vendor FAQs](#)
- Vendor Maintenance
  - [Vendor FAQs](#)
- Background Screening
- Vendor Resources
- REBA
- REBA TPCA

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**VR Office Directory**

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Google™ Custom Search

Search

### VENDOR APPLICATIONS

- [VR Standard Vendor Application \(RTF\)](#) ←
  - [Group Medical Vendor Application \(RTF\)](#)  
Healthcare organizations seeking registration for the organization and not for individuals of the organization.
  - [Group Sign Language Interpreter Application \(RTF\)](#)  
Sign Language Interpreter organizations seeking registration for the organization and not for individuals of the organization. ←
  - [Employment Services Contract Application \(RTF\)](#)  
Providers seeking to enter into a contract to provide Employment, Supported Employment and/or On-the-Job Training services.
  - [On-the-Job Training Application for Vendors \(RTF\)](#)
  - [Vocational Evaluation Providers \(RTF\)](#)
  - [Certified Business Technical Assistance and Consultation \(self-employment\) Provider \(RTF\)](#)
  - [Personal Care Assistant Application \(RTF\)](#)
  - [Employment Network Providers \(RTF\)](#)
  - [Tutor Application \(RTF\)](#)
  - [Transportation Provider](#)
  - [Aircraft Pilot or Aircraft Dispatcher Training School Provider](#)
  - [Rehabilitation Technology Services Application and Manual](#)
- Additional Information and Forms**
- [Vendor Qualifications Manual \(PDF\)](#) ←
  - [Hospital Services Reimbursement Form \(RTF\)](#)
  - [Psychological Data Sheet \(RTF\)](#)