



# UNIVERSITY OF NEBRASKA AT OMAHA DISABILITY SERVICES

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## Sign Language Interpreting Service Provision Policies & Procedures

### I. INTRODUCTION

The University of Nebraska-Omaha (UNO) is required under the Americans with Disabilities Act and Section 504 of the Rehabilitation Act to provide “appropriate accommodations” which in certain instances includes providing “qualified” interpreting services to deaf and hard of hearing (HOH) individuals. This requirement covers all programs or activities conducted and sponsored by UNO on campus or across the state. The compliance responsibility for determining what is an “appropriate accommodation” and for monitoring programs, activities, and services provided for the purpose of accommodating individuals with disabilities rests with the ADA/504 Compliance Officer.

#### A. The Diffusion of Responsibility Model

UNO has adopted a diffusion of responsibility model that places provision of services for individuals with disabilities at the level of program implementation. For example, interpreters for students who are deaf or HOH will be the financial responsibility of Services for Students with Disabilities, whereas interpreters for faculty and staff who are deaf or HOH will be funded by the department for which the individual works. Interpreters for University events (e.g., commencement, Lied Center performances, etc.) will be paid by the department sponsoring the event.

The Interpreter Coordinator, housed in Services for Students with Disabilities, will maintain lists of interpreters who are qualified for each of the various environments and will schedule interpreters when required. Departments are required to use interpreters on the list UNOess they have been in communication with the ADA/504 Compliance Officer and have been given other instructions.

#### B. Qualified Interpreting Services Advisory Committee

The Qualified Interpreting Services Advisory Committee (QISA) is composed of individuals who have expertise in interpreting issues for deaf and HOH individuals or expertise in the provision of programming at UNO. The QISA Committee shall meet at least annually. The Interpreter Coordinator and the ADA/504 Compliance Officer will serve as ex-officio committee members. The committee shall consist of at least one individual with expertise in sign language, one interpreter with experience in higher

education, one student, a representative from the cooperative extension administration, a representative from the faculty who has had experience with interpreters, and a representative from employees and students at the University who use interpreting services. At least one member must be from outside the UNO community and two members must be individuals who are deaf or HOH.

Appointments are made by the ADA/504 Compliance Officer. Terms of appointment are three years with no limit on the number of terms an individual may serve.

The QISA Committee recommends standards for interpreter qualifications for the various environments in the University system to the ADA/504 Compliance Officer. These standards are used by the Interpreter Coordinator to determine the most qualified interpreter for each interpreting setting. The QISA Committee recommends policies for annual review of interpreters, and the qualifications of the Interpreter Coordinator responsible for determining whether an interpreter is qualified to interpret in various settings. The ADA/504 Compliance Officer and the Interpreter Coordinator will meet once a year with deaf or HOH recipients of interpreting services to receive feedback to be reported to the QISA Committee at their annual meeting.

## **II. PROGRAM IMPLEMENTATION**

Program implementation takes place in three broad categories: Student Services, Employment, and University Sponsored Events or Programs. Each of these environments has different requirements in terms of what constitutes “qualified” interpreting. If a UNO employee or student wants to attend a function conducted by an entity outside UNO, it is the responsibility of that entity to provide interpreting services and the responsibility of the employee or student to request such services. The Interpreter Coordinator is responsible for determining which placements are appropriate for interpreters. The ADA/504 Compliance Officer has responsibility for all decisions concerning departmental responsibility for providing interpreting services.

### **A. Services for Students with Disabilities Office**

The provision of interpreters for current and prospective students is the responsibility of the Services for Students with Disabilities Office (SSD).

### **B. The Provision of Interpreters for Faculty and Staff**

Interpreters for faculty and staff are paid for by the department in which they are employed except when the employee is attending a workshop, training, etc. sponsored by another department. In this case, the sponsoring department is responsible for providing interpreter services. The employee or his/her supervisor is responsible for contacting the department sponsoring the event to arrange for interpreting services.

## **C. Interpreters for Special Events**

The provision of interpreters for special events is the responsibility of the department sponsoring the event UNOess the performance is not public and the only reason an interpreter is required is by student request.

Some special assignments, such as Lied Center Performances, may require extra preparation time on the part of the interpreters. It is recognized that adequate preparation is essential to the provision of quality interpreting services. A written estimate of preparation time and estimated cost will be determined through negotiation with the department, the Interpreter Coordinator, and the interpreter being requested for a special event assignment in advance.

## **III. JOB DESCRIPTIONS**

### **A. Interpreter Coordinator**

#### **1. Description of Work**

The Interpreter Coordinator is responsible for insuring students' and faculty/staff members' needs are met consistent with the policies and procedures detailed in this document. The Interpreter Coordinator coordinates and supervises interpreting and transliterating services for faculty, staff, students and other individuals who are deaf or hard of hearing. When no other interpreter is available, the Interpreter Coordinator will interpret if possible. The Interpreter Coordinator conducts workshops and provides information for students, faculty, and staff regarding the use of interpreters, provides mentorship, and conducts in-service activities for staff and contracted interpreters. The Interpreter Coordinator is responsible for determining which placements are appropriate for interpreters and for conducting annual evaluations of interpreting performance.

#### **2. Minimum Qualifications**

Bachelor's Degree in Deafness-related field preferred or equivalence in interpreting and coordinating in higher education. Two years experience as an interpreter in post-secondary educational institution. Certification from the National Registry of Interpreters for the Deaf preferred. QAST Level 5 Rating (Mid-American Quality Assurance Screening Test for Sign Language Interpreters) or EIPA (Educational Interpreter Performance Assessment) Level 5 rating in ASL at a post-secondary setting in both voice-to-sign and sign-to-voice.

## **B. Sign Language Interpreter**

### 1. Description of Work

Interpreting and/or transliterating in classroom lectures and discussions, University sponsored activities, conferences, seminars, workshops, meetings, and telephone calls, as assigned. Completing paperwork as it relates to University interpreting assignments. Preparing for interpreting assignments by becoming familiar with the material to be interpreted.

### 2. Minimum Qualifications

Two years interpreting experience in educational settings or graduation from a degree program in interpreting. A minimum of QAST Level 3 Certification or EIPA Level 3 (post-secondary using ASL or PSE) or Certification from the National Registry of Interpreters for the Deaf is required to interpret for undergraduate classes. A minimum of QAST Level 4 Certification or EIPA Level 4 (post-secondary using ASL or PSE) or Certification from the National Registry of Interpreters for the Deaf is required to interpret for graduate classes. A list of alternative evaluation tools that are acceptable will be maintained by the Interpreter Coordinator.

## **IV. STANDARDS OF CONDUCT**

Interpreters who are employed by UNO are expected to conduct themselves according to high standards of professionalism and to follow the University of Nebraska-Omaha Professional Conduct Code of Ethics for Interpreters. The UNO Professional Conduct Code of Ethics for Interpreters is attached as Appendix A.

## **V. EMPLOYMENT PROCEDURES**

### **A. Selection and Placement**

All potential interpreters will be screened by the Interpreter Coordinator. An interview is required to provide information for placement purposes. The interview will be conducted by a team of individuals who are qualified to evaluate interpreting skills and are approved by the ADA/504 Compliance Officer and the Director of Services for Students with Disabilities. This ad-hoc evaluation team will consist of the Interpreter Coordinator, an interpreter, and a deaf or HOH individual, preferably a student. All information relating to the applicant is confidential.

Based on the team's assessment of the candidate's strengths, the Interpreter Coordinator will make the final employment and placement decision. Certification obtained through the National Registry of Interpreters for the Deaf, Inc. (RID) or a regional procedure such as the Mid-America Quality Assurance Screening Test for Sign Language Interpreters (QAST), as well as education and prior employment history,

will be considered in the employment, placement, and salary for interpreters. Interpreters are responsible for notifying the Interpreter Coordinator immediately of any changes in certification status.

## **B. Annual Review**

All interpreters employed by UNO to provide interpreting services on a regular basis, including the Interpreter Coordinator, will have an annual review. The Interpreter Coordinator will complete the annual review of all interpreters, and the Director of SSD will complete the Interpreter Coordinator's review. These reviews will include evaluations completed by deaf or HOH students or employees who have received services during the year. Evaluations will be completed by recipients of service on a schedule appropriate to the type of services to be determined by the Interpreter Coordinator. For the purposes of annual review, a modified EIPA evaluation will be coordinated by the Interpreter Coordinator. The EIPA will be conducted using a live or taped sample from a typical classroom assignment for that particular interpreter, as defined in the EIPA guidelines. The EIPA scoring sheet will serve as a systematic way to objectively measure the interpreters' work in the classroom environment. Interpreters will also be asked to submit documentation of continuing education activities or other professional growth experiences.

## **C. Assignment of Interpreters**

The Interpreter Coordinator is responsible for assignment of interpreters. Lists of interpreters with particular expertise will be developed and maintained by the Interpreter Coordinator.

## **D. Scheduling of Interpreters for Students and Employees**

### **1. Requests for Interpreters**

Interpreters for deaf and hard of hearing students and employees are requested, approved, and scheduled through the Interpreter Coordinator.

Students and employees are responsible for informing the Interpreter Coordinator as to the exact date, time, location, and individual preferences for interpreters. In addition, the type of event must be specified so it can be determined which University department is responsible for providing interpreting services. When insufficient information is given to provide an interpreter, services are not guaranteed.

The Interpreter Coordinator will be accessible via TTY, voice mail capable of recording TTY messages, and email.

## 2. Advance Notice Required

Students and employees should inform the Interpreter Coordinator as soon as they have determined a need for interpreting services. Given the severe shortage of interpreters in Lincoln/Lancaster County who are qualified to provide services at the college level, UNO strongly suggests that special requests for interpreters be made at least two weeks prior to the need for interpreter service. The University acknowledges that employees and students may not have control of their schedules, therefore a serious effort will be made to secure an interpreter when less than two weeks notice is given.

## 3. Interpreters with Specific Expertise

The Interpreter Coordinator may find, through experience and communication with consumers, that certain interpreters are particularly well suited for certain assignments. This may arise as a result of special knowledge of the subject to be interpreted or other factors that deserve consideration when evaluating the need to provide the best communication for the particular situation. In such instances, the Interpreter Coordinator shall attempt to match the interpreter with specific expertise to the assignment.

## 4. Team Interpreters

Team Interpreters must be used for assignments that are longer than two hours in duration. The need for team interpreting shall be negotiated among the recipient of services when practical, the interpreter, the Interpreter Coordinator, and the department requesting the interpreting services when it is not student related. When two or more interpreters are working together, the interpreter who is not actively interpreting should provide support. This means that all interpreters are working at all times.

## 5. Interpreter Breaks

It is strongly recommended that the interpreter and recipient of services receive a 10-minute break after approximately 75 minutes of continuous interpreting in platform/lecture situations. The interpreter has the right to request a break in interpreting if it is felt that his/her well-being is at risk.

## 6. Failure to Schedule an Interpreter

When a qualified interpreter cannot be found, the Interpreter Coordinator will negotiate alternative accommodation with the consumer. This may include an audiotape of the event for later interpretation or transcription, a stenographer/interpreter, or a note taker.

## 7. Interpreter – Consumer Mismatch

If the interpreter or consumer of the interpreting services believes that the interpreter is not appropriate for a particular situation, an immediate report must be made to the Interpreter Coordinator. The Interpreter Coordinator is responsible for mediating among the parties involved or making appropriate adjustments to the placement.

## VI. ASSIGNMENT CANCELLATIONS

### A. Cancellation of One-time Assignments

Part-time permanent staff interpreters must be informed of the cancellation of a one-time assignment at least 24 hours before the scheduled starting time of the assignment. If an assignment is cancelled less than 24 hours in advance, the interpreter may bill for a two-hour minimum or for 50% of the cancelled assignment whichever is greater. Part-time permanent staff interpreters must report to the Interpreter Coordinator for reassignment.

On-call interpreters are entitled to 48 hours advance notice for cancellation of one-time assignments. If an assignment is cancelled less than 48 hours in advance, the interpreter may bill for a two-hour minimum or for 50% of the cancelled assignment whichever is greater. On-call interpreters do not have to report for reassignment.

### B. Cancellation of Ongoing Assignments

Ongoing assignments are defined as those that have at least a two-week duration. If an ongoing assignment is cancelled less than 48 hours prior to the starting date, interpreters will be paid for the first two weeks of the assignment. If a cancellation occurs at any time during an ongoing assignment, interpreters will be paid for the subsequent two weeks of that assignment. On-call interpreters who accept work during the same hours may not bill for a cancellation. Part-time permanent interpreters are expected to negotiate reassignment with the Interpreter Coordinator.

In the event that an ongoing classroom assignment is cancelled for one date only, all interpreters will be paid for the assignment regardless of the length of notification, as long as they report to the Interpreter Coordinator for reassignment.

If an interpreter does not have an answering machine or similar service and fails to receive notification of a cancellation, UNO will not be responsible for paying the interpreter for the cancelled assignment.

## **C. Failure of Students or Employees to Appear**

### **1. Duration of Waiting Period**

Interpreters are required to wait at least 30 minutes for assignments that are from one to two hours in duration, and one hour for assignments longer than 3 hours. Interpreters must immediately notify the Interpreter Coordinator if the consumer fails to appear. If the assignment was scheduled to occur after office hours, interpreters must inform the Interpreter Coordinator the following business day.

Because it is not always possible to ascertain if there are deaf participants at special events, interpreters are expected to interpret throughout the event. If there are any questions, the interpreter should see the on-site contact person, or call the Interpreter Coordinator for clarification.

If an interpreter learns of a cancellation on site, the consumer fails to appear, or the assignment ends much earlier than expected, the interpreter must contact the Interpreter Coordinator to see if a suitable replacement assignment can be scheduled.

### **2. Failure to Cancel Interpreters**

Students and employees are required to cancel interpreter services if they are not needed. If the student or employee fails to notify the Interpreter Coordinator in a timely manner on three occasions during the semester, he/she must meet with the Interpreter Coordinator before interpreting services may be resumed. Students or employees who have failed to notify the Interpreter Coordinator on more than 5 occasions during an academic year may have their services revoked until a written contract is negotiated with the Director of Services for Students with Disabilities, or in the case of employees, the ADA/504 Compliance Officer.

## **D. Substitutes**

If an emergency prevents an interpreter from completing an assignment, the interpreter must inform the Interpreter Coordinator immediately, so that he/she may attempt to secure a qualified replacement. Substitutes may be suggested by the interpreter but are subject to approval by the Interpreter Coordinator.

## **E. Termination for Cause**

In no case shall a termination of employment for cause be deemed to be a cancellation under this section.

## **VII. COMPENSATION**

### **A. Pay Scales**

1. All interpreters employed by the University of Nebraska-Omaha are required to have their current ratings or certification on file with the Interpreter Coordinator. Interpreters must notify the Interpreter Coordinator immediately of any changes in rating or certification status.
2. The Director of Services for Students with Disabilities and the ADA/504 Compliance Officer establish the pay scale for interpreters. The pay scale is available from the Interpreter Coordinator upon request.

### **B. Two Hour Minimum**

On-call interpreters shall be paid for a minimum of two hours of interpreting services for any assignment of less than two hours. Typically, the two-hour minimum is paid in the following cases:

1. The first assignment of the day;
2. A subsequent assignment at a different location (e.g., transfer from east campus to city campus), which begins at least four hours after the previous assignment;
3. The first evening assignment of the day (one that is scheduled to start after or extend past 5 pm).

### **C. Mileage**

Mileage for business related travel associated with interpreting services will be paid in accordance with University policy, as permitted by the Internal Revenue Service.

### **D. Billing Guidelines**

1. Interpreters shall not bill for mealtimes UNOess they are required to interpret during that time, or UNOess it has been negotiated in advance as a part of an all day assignment.
2. Interpreters may not bill for an assignment until after the date of the assignment.
3. If an assignment begins before or continues past the scheduled time, interpreters must immediately notify the Interpreter Coordinator.
4. Interpreting time is billable in half-hour units. If an assignment extends at least 15 minutes into another half-hour unit, interpreters may bill for that half hour.
5. The Interpreter Coordinator will determine the amount of preparation time that will be authorized.

## **VIII. GRIEVANCE PROCEDURES**

The University of Nebraska-Omaha has adopted an internal grievance procedure providing for prompt and equitable resolution of complaints alleging any action prohibited by federal or state regulations implementing the Americans with Disabilities Act or section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. 794). The ADA and Section 504 Grievance Procedure is attached as Appendix B. Other university grievance procedures are available through the Academic Senate, Human Resources, and Student Judicial Affairs.

## **IX. INFORMATION DISSEMINATION**

The Interpreter Coordinator will provide information to all appropriate UNO faculty, staff, and students concerning interpreting services. All faculty, staff, and students requesting interpreter services must attend an orientation meeting. The Interpreter Coordinator has responsibility for scheduling meetings in accordance with consumer needs and appropriate provision of services.

## **X. AMENDMENTS TO THIS POLICY**

Revisions to this policy may be suggested by students, faculty/staff, interpreters, the Interpreter Coordinator, the Director of Services for Students with Disabilities, or the ADA/504 Compliance Officer. All revisions will be reviewed by the Qualified Interpreting Services Advisory Committee, the Interpreter Coordinator, the Director of Services for Students with Disabilities, and the ADA/504 Compliance Officer. Recommendations for revision will be forwarded to the Chancellor for action.

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The University of Nebraska at Omaha shall not discriminate based upon age, race, ethnicity, color, national origin, gender-identity, sex, pregnancy, disability, sexual orientation, genetic information, veteran's status, marital status, religion, or political affiliation.