



ACCESSIBILITY SERVICES CENTER

Sign Language Interpreting Service Provision Procedures

651583

A. INTRODUCTION

The University of Nebraska at Omaha (UNO) is required under the Americans with Disabilities Act and Section 504 of the Rehabilitation Act to provide "appropriate accommodations" which may include providing "qualified" interpreting services to Deaf and Hard of Hearing 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", monitoring programs, activities, and services provided for the purpose of accommodating individuals with disabilities resides with the Director of Accessibility Services Center. Appeals associated with compliance are managed by the ADA/504 Coordinator.

B. PROGRAM IMPLEMENTATION

Program implementation takes place in three broad categories: Student Services, Faculty/Staff, and University Sponsored Events or Programs. Each of these environments have 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 Director of Accessibility Services Center has responsibility for all decisions concerning departmental responsibility for providing interpreting services.

The Interpreter Coordinator, housed in the Accessibility Services Center (ASC), 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 unless they have been in communication with the Director of ASC and/or ADA/504 Coordinator and have been given other instructions.

A. Interpreters for Students

The provision of interpreters for current and prospective students is the responsibility of the ASC.

B. Interpreters for Faculty and Staff

Interpreters for Faculty/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 interpreting 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; unless the performance is not public and the only reason an interpreter is required is by student request.

Some special assignments, such as 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.

C. STANDARDS OF CONDUCT

Interpreters who are employed by, or contracted with, UNO are expected to conduct themselves according to high standards of professionalism and to follow the NAD-RID Code of Professional Conduct for interpreters. Below are the tenets:

1. Interpreters adhere to standards of confidential communication.
2. Interpreters possess the professional skills and knowledge required for the specific interpreting situation.
3. Interpreters conduct themselves in a manner appropriate to the specific interpreting situation.
4. Interpreters demonstrate respect for consumers.
5. Interpreters demonstrate respect for colleagues, interns, and students of the profession.
6. Interpreters maintain ethical business practices.
7. Interpreters engage in professional development.

D. EMPLOYMENT PROCEDURES

A. Annual Evaluation

All interpreters employed by UNO to provide interpreting services on a regular basis, including the Interpreter Coordinator, will have an annual evaluation. The Interpreter Coordinator will complete the annual evaluation of all interpreters, and the Director of ASC will complete the Interpreter Coordinators' review.

B. Scheduling of Interpreters for Students, Faculty/Staff and University Special Events

1. Requests for Interpreters

Requests for interpreters for Deaf and Hard of Hearing students, Faculty/Staff, and for University Special Events are approved and scheduled by the Interpreter Coordinator.

Students, Faculty/Staff and Organizers of University Special Events are responsible for informing the Interpreter Coordinator of the date, start and end times, and location. In addition, the type of event must be specified so it can be determined which University department is responsible for providing interpreting services.

The Interpreter Coordinator will be accessible via email, voice mail, and text.

2. Advance Notice Required

Students, Faculty/Staff and Organizers of University Special Events should inform the Interpreter Coordinator as soon as they have determined a need for interpreting services. UNO strongly suggests that requests for interpreters be made at least two weeks prior to the need for interpreting services. Providing less than two weeks' notice may impact how quickly an interpreter will be secured.

3. Team Interpreters

The use of team interpreters will be decided on a case by case basis. Most assignments over one hour will be teamed, however it will depend on the needs of the specific assignment. The Interpreter Coordinator will make decisions regarding teams based on each assignment. 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 during scheduled assignments.

4. Failure to Schedule an Interpreter

When a qualified interpreter cannot be found, the Interpreter Coordinator will negotiate alternative accommodations with the consumer.

5. Interpreter - Consumer Mismatch

If the interpreter or consumer of the interpreting services believes that the interpreter is not appropriate for a particular situation, the Interpreter Coordinator must be notified immediately. The Interpreter Coordinator is responsible for mediating the issues between the parties or making appropriate adjustments to the placement.

E. ASSIGNMENT CANCELLATIONS

A. Cancellation of One-time Assignments

Temporary/part-time interpreters and contract interpreters will be notified by the Interpreter Coordinator of the cancellation of a one-time assignment at least 24 hours before the scheduled starting time of the assignment. If an assignment is canceled less than 24 hours in advance, the interpreter will be paid for the time they were scheduled to work. If another assignment is available during the same time, the interpreter will be expected to fill in for that assignment if requested. There may be situations where this is not feasible due to the need for expertise on a particular topic or due to the location of an assignment. In those circumstances the interpreter will be paid for the canceled assignment.

Part-time permanent staff interpreters must report to the Interpreter Coordinator for reassignment, if reassignment is available the interpreter will not be paid for the canceled assignment, but will be paid for the assignment worked.

B. Cancellation of Ongoing Assignments

Ongoing assignments are defined as those that have at least a two-week duration.

1. If an ongoing assignment is canceled less than 48 hours prior to the starting date, Temporary/part-time interpreters will be paid for the first two weeks of the assignment. If a cancellation occurs at any time during an ongoing assignment, Temporary/part-time interpreters will be paid for the subsequent two weeks of that assignment.

Part-time permanent staff interpreters whose assignment was canceled are expected

to negotiate reassignment with the Interpreter Coordinator. If reassignment is available the interpreter will not be paid for the canceled assignment, but will be paid for the re-assignment actually worked.

2. In the event that an ongoing classroom assignment is canceled for one date only, interpreters will not be paid for the canceled assignment if they have received a 48 hour notice. For example, a cancellation announcement during a Monday class for the Wednesday class constitutes a 48 hour notice and the canceled Wednesday assignment will not be paid. The Interpreter must inform the Interpreter Coordinator as soon as possible that the assignment is canceled. Interpreters shall report to the Interpreter Coordinator for reassignment. In the event the interpreter has received less than a 48 hour notice of cancellation, and reassignment is available, then the canceled assignment will not be paid, but the assignment worked will be paid.

It is the Interpreter's responsibility to check syllabi at the beginning of the semester for any days the instructor will not have class. If there are days that the class will not meet, the interpreter is to inform the Interpreter Coordinator at the beginning of the semester about those dates. Interpreters will not be paid for these assignments.

For exams/finals, if a staff interpreter is in the class they will interpret for the exam/final. The Temporary/part-time interpreter may not bill for this time. If your team is not a staff interpreter, please notify Interpreter Coordinator of all exam dates as soon as possible to determine who will interpret exams/finals.

C. Notification of Cancellation

Cancellation notifications will be sent to Interpreters via email and/or text messaging. All interpreters are expected to provide the necessary contact information to the Interpreter Coordinator. Interpreters are obligated to check their email and text messages regularly for cancellation notifications. Compensation for canceled assignments will be addressed in accordance with these procedures.

D. Failure of Students or Faculty/Staff to Appear for Assignments

1. Duration of Waiting Period

Interpreters are required to wait at least 15 minutes for assignments that are from 1 to 2 hours in duration, and 30 minutes for assignments longer than 2 hours. Interpreters must immediately notify the Interpreter Coordinator if the consumer fails to appear via text message and/or email.

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 contact 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 Faculty/Staff are required to cancel interpreting services if they are not needed. If the Student or Faculty/Staff 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 Faculty/Staff who have failed to notify the Interpreter Coordinator on more than five occasions during an academic year may have their services revoked until meeting with the Director of ASC, or in the case of Faculty/Staff, the designated employee or faculty human relations specialist.

E. Substitutes

If the regularly assigned Interpreter needs a substitute for an assignment, they are required to notify the Interpreter Coordinator immediately and provide the Interpreter Coordinator with all pertinent information relating to the assignment for which the regular Interpreter is seeking a substitute. The Interpreter Coordinator will maintain a current list of approved interpreters, and will provide the list to all regularly assigned Interpreters at the beginning of each semester.

If the regularly assigned Interpreter notifies the Interpreter Coordinator prior to the beginning of the semester, the Interpreter Coordinator will find a substitute. However, once the semester begins, it will be the responsibility of the regularly assigned Interpreter to locate a substitute from the approved list of Interpreters provided by the Interpreter Coordinator. If the regularly assigned Interpreter secures a substitute Interpreter who is not on the list, UNO will not be responsible for compensating the substitute Interpreter.

Once a substitute Interpreter has been identified, the regularly assigned Interpreter must notify the Interpreter Coordinator via email of the substitution along with all relevant information regarding the assignment(s). The regularly assigned Interpreter will carbon copy the substitute Interpreter on the email to the Interpreter Coordinator.

If the regularly assigned Interpreter cannot locate a substitute Interpreter they must maintain their obligation to the University to provide service. In the case of severe illness or emergency, the regularly assigned Interpreter must contact the Interpreter Coordinator with all relevant information relating to the assignment(s) as soon as possible and the Interpreter Coordinator will be responsible for finding a substitute Interpreter.

F. Termination

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

F. COMPENSATION

A. Pay Scales

1. The Director of ASC and the ADA/504 Coordinator establish the pay scale for interpreters. The pay scale is available from the Interpreter Coordinator upon request.

B. Two Hour Minimum

Temporary/part-time and contract interpreters shall be paid for a minimum of two hours for any assignment of less than two hours.

1. Temporary/part-time and contract interpreters bill 2 hour minimums or running time if the classes are less than 2 hours apart. For example, an interpreter who has a class from 10:00-11:15a.m. and another class from 12:00-1:15p.m. would bill from 10:00-1:15 p.m., for 3.25 hours rather than a 2 hour minimum at 10a.m. and a 2 hour minimum at 12p.m. for a total of 4 hours.

2. A new 2 hour minimum will begin for evening classes (those that begin at 5pm or after). For example, an interpreter who has a class from 2:30-3:45p.m. and another class from 5:30-8:10pm would bill a 2 hour minimum for their day class and 2.75 hours for their evening class for a total of 4.75 hours, rather than billing straight through from 2:30-8:10pm for a total of 6.75 hours.

C. Mileage

1. Mileage for business related travel associated with interpreting services will be paid in accordance with University of Nebraska policy and Internal Revenue Service guidelines.

D. Payment Guidelines

1. Interpreters will not be paid for mealtimes unless they are required to interpret during that time, or unless it has been negotiated in advance as a part of an all-day assignment.
2. Interpreters will not be paid for an assignment until after the date of the assignment.
3. If an assignment begins before or continues past the scheduled time, interpreters must promptly notify the Interpreter Coordinator.
4. Interpreting time is paid in fifteen minute units past the 2 hour minimum. For example, if an assignment lasts 2 hours and 10 minutes the interpreter will be paid for 2.25 hours.
5. Preparation time will be considered paid-time but must be authorized by the Interpreter Coordinator in advance. If an interpreter needs more preparation time than originally approved they must seek additional authorization from the Interpreter Coordinator before working additional preparation time.
6. Interpreters are expected to log time worked using the electronic time sheet in Firefly.
7. Interpreters are expected to purchase University parking permits. Parking permits may be purchased through Parking Services, located at 1313 S. 67th Avenue. More information can be found on the UNO website under Parking Services.

G. GRIEVANCE PROCEDURES

The University of Nebraska at 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). This information can be found as Attachment A. The Office of Equity, Access, and Diversity can be reached at (402) 554-3523.

H. INFORMATION DISSEMINATION

The Interpreter Coordinator will provide information to all appropriate UNO faculty, staff, and students concerning interpreting services upon request. The Interpreter Coordinator has responsibility for scheduling meetings in accordance with consumer needs and appropriate provision of services.

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.



AMERICANS WITH DISABILITIES ACT AND SECTION 504 GRIEVANCE PROCEDURE

The University of Nebraska at Omaha has adopted an internal grievance procedure providing for prompt and equitable resolution of complaints alleging any action prohibited by Sections 503 or 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. 794) or Section 202 of the Americans with Disabilities Act of 1990 (42 U.S.C. 12132). Section 202 states, in part, that “no individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any such entity.”

Complaints from students should be addressed to Cathy Pettid who has been designated to investigate complaints under the ADA and the Rehabilitation Act.

Cathy Pettid
Assistant Vice Chancellor for Student Success & Dean of Students
Interim ADA/504 Coordinator
201 Eppley Administration Building
(402) 554-3523
cpettid@unomaha.edu

Complaints from employees should be addressed to Kristina Hoffmann who has been designated to investigate complaints under the ADA and the Rehabilitation Act.

Kristina Hoffmann
Employee Relations Specialist
205 Eppley Administration Building
(402) 554-2463
kristinahoffmann@unomaha.edu

1. A complaint should be filed in writing or verbally, contain the name and address of the person filing it, and briefly describe the alleged violation of the regulations.
2. A complaint should be filed within 30 calendar days after the complainant becomes aware of the alleged violation. (Special circumstances will be considered on a case-by-case basis.)
3. An investigation, as may be appropriate, will follow a filing of complaint. Student investigations will be conducted by the Dean of Students or his/her designate. Employee investigations will be conducted by the Human Resources Employee Relations Specialist or his/her designate. These rules contemplate informal but thorough investigations, affording all interested persons and their representatives, if any, an opportunity to submit evidence relevant to the complaint.

4. A written determination as to the validity of the complaint and a description of the resolution, if any, will be issued by the appropriate office and a copy forwarded to the complainant, the appropriate campus authority, and the Chancellor no later than 30 calendar days after its filing.
5. The appropriate office will maintain the files and records relating to the complaints filed.
6. The complainant can request a reconsideration of the case in instances where he or she is dissatisfied with the resolution. The request for consideration must be made within 10 working days to the ADA/504 Compliance Officer, 222 Varner Hall, 0742, V/TDD (402) 472-8404.
7. The right of a person to a prompt and equitable resolution of the complaint filed hereunder will not be impaired by the person's pursuit of other remedies such as the filing of a Section 504 or ADA complaint with the responsible federal government or agency. Using this grievance procedure is not a prerequisite to the pursuit of other remedies.
8. These rules will be construed to protect the substantive rights of interested persons, meet appropriate due process standards and assure that the University of Nebraska at Omaha complies with Section 504 and the ADA and their implementing regulations.

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University of Nebraska at Omaha
6001 Dodge Street / Omaha, NE 68182-0001