



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

## Part A

**\*This Includes Individuals who are Deaf, Hard of Hearing,  
Late-Deafened, DeafBlind and Deaf Plus**



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Note: This document has a second part: *Guide for the Provision of Interpreting Services for Persons with Hearing Loss: Part B Purchasing Vendor Services* (© 2021).

# Section 1. Basic Legal and Ethical Framework for Interpreting in Vocational Rehabilitation

## Purpose of This Guide

The Division of Vocational Rehabilitation (VR) of the Florida Department of Education (FDOE) recognizes the importance and obligation of communication access for its individuals and staff who are deaf, hard of hearing, late-deafened and DeafBlind. This document establishes uniform VR guidelines to provide effective interpreting services to individuals with hearing loss.

The predecessors of this manual are the *VR Manual on Interpreter Services for Persons who Work with Individuals who are Deaf and Hard of Hearing* (2009) and *VR Guide for Provision of Interpreting Services for Individuals with Hearing Loss* (2015). This revision incorporates the latest standards and practices of professional interpreters who work for and with VR and provides the framework for service consistency throughout VR statewide.

## Legal and Ethical Standards

Every state VR program is expected to have a program policy on interpreting services that complies with legal and ethical standards of provision. These enclosed guidelines comply with Title V, Section 504 of the Rehabilitation Act of 1973 (Section 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.).

Commission on Rehabilitation Counselors (CRC) Certification Code of Ethics (2017) contain relevant ethics to the provision of vocational services to individuals with hearing loss. These include: Respecting Diversity (A.2.), Information Shared in Interdisciplinary Teams (B.3.b), Accessibility (C.2.) and Cultural Competence (D.2) among others.

*Operational Policies and Procedures Manual for VR Counselors* (Counselor Policy Manual) or the *Policy Manual for VR Privatization Initiatives*, as appropriate, list Interpreting Services and other Technological Aids (Chapter 11.09) to outline information on the provision of interpreting and other communication assistance with VR individuals.

## VR's Requirement to Provide Qualified Interpreters

VR recognizes the importance of providing auxiliary aids and services and a qualified interpreter as reasonable accommodations. Providing a qualified interpreter ensures access to the information needed by individuals in order to participate in the VR process. It enables 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 VR Counseling staff shall inform the individual with hearing loss that VR will provide interpreting services as needed to ensure access to all services in and outside the VR office. In addition, VR staff shall explain the procedures used within the VR unit to request interpreting services for rehabilitation activities to the individual with hearing loss and relevant vendors providing services to an individual.

### **VR's Commitment to Provide Interpreters 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.

Staff Interpreters are considered members of the rehabilitation team. When meetings and activities are mandated for all VR staff to attend, the staff interpreter can participate as a staff member and a vendor interpreter(s) will be secured. 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 prearranged and provided so employees have equal access to all work-related activities.

### **Responsibility of Other State Divisions/Agencies and Stakeholders to Provide Interpreting Services for Persons with Hearing Loss**

Each division/bureau within FDOE 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 participants.

## Section 2. Interpreting Services for VR Settings

### Determining Appropriate Accommodations for Individuals with Hearing Loss

VR staff are expected to maintain full, effective and clear communications with all individuals. During initial contact with the individual who indicates hearing loss (or as noted on the VR application), the VR staff shall inquire in advance and honor the individual's preference for auxiliary aids or services (e.g., interpreting services) and do their best to meet those requests for VR meetings and sponsored appointments (e.g., vocational evaluations, doctor's appointments, job interviews, etc.).

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

- Speech and speech reading
- Using residual hearing (and technology like hearing aids and assistive listening devices)
- Writing
- Gesturing/Home signs
- Sign Language and its different modes (e.g., American Sign Language, Signed English, sign languages from foreign countries), and
- A combination of techniques

The communication ability also varies considerably among individuals with hearing loss. Contrary to popular belief, not every individual with hearing loss has speech-reading skills or good understanding of American Sign Language (ASL). Additionally, because of the diverse educational experiences and access to English, literacy is not an indication of intellectual ability of this group. Types of interpreting services also vary depending on the individual's communication mode and ability. Individuals with multiple disabilities (in addition to a hearing loss), as well as those who are not proficient in ASL or English, need specialized interpreting services.

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

### Providing Qualified Interpreters

To provide qualified interpreters, VR staff may:

- Utilize available staff interpreters.
- Purchase interpreting services from RIMS-approved ASL/English interpreting vendors (Interpreters for the Deaf) on an as-needed basis with prior authorization or with purchase order.
- Call through video relay services (VRS) interpreters to only convey basic information by telephone (e.g., appointment times, directions and check-in calls).
  - Note: It is illegal to use VRS if both parties are in the same room.
  - VRS is not recommended as an option to provide counseling and guidance nor to hold Annual Reviews and Preliminary Assessments. VRS interpreters may not meet VR's minimum standard for interpreters.

Interpreting services may be available in person with the VR counselor (VRC) and individual or may be provided through technology as virtual interpreting via MS Teams, GoToMeeting and other platforms. VR must determine the best match for the individual's needs. Virtual interpreting is may not be appropriate for some individual's such as those with vision issues or those whose language is atypical/non-standard. Additionally, individuals who choose not to use virtual interpreting, VR will provide face-to-face interpreting for these customers, as possible.

### **Notifying the Individual of Rights to Have Qualified Interpreters**

It is the responsibility of VR staff to notify the individual with hearing loss of their right to a qualified interpreter. If the individual brings someone to interpret for them, such notification will be made directly to the companion or by any other reasonably available method of communication (e.g., writing, typing, etc.) on our limitation in accepting a non-VR interpreter to provide services to the individual. 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.
- Directions on how to request interpreting services through the VR office for work-related activities.
- 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 the individual continues to insist that information be provided by a non-VR-provided "interpreter," the individual shall be required to sign the *Client's Waiver of Confidentiality Rights* as referenced in the *Counselor Policy Manual*, Chapter 2.03(1)b. This waiver will be retained in the individual's file. After the appointment, reiterate the information above in an email and enter a case note with a summary of services provided by non-VR-provided interpreter and how the information above was conveyed.

### **Listing of Specialty Interpreting Skill Sets and Services**

Some individuals with hearing loss have special interpreting and communication needs. If an individual requests or exhibits a need for a specialized interpreting service, VR shall attempt to find an interpreter with the required skills. Some examples of specialized interpreting are:

- **Trilingual interpreters**

For an individual who uses a different sign or spoken language. The interpreter who provides trilingual services (fluent in ASL/English and another spoken language) must be registered and approved in RIMS as an ASL/English interpreter and provide evidence of the third skill. After the appointment, the customer shall be asked if communication was effective.

- **Tactile Interpreters**

For interpreters to work with individuals who are Deafblind, they must be familiar with the variety of tactile interpreting techniques, be comfortable with working in physical contact with the individuals, and must understand the dynamics of conveying information 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. Note that appointments of an hour requiring tactile interpreting will require a team of interpreters.

- **Close Vision or Distance Vision Interpreters**

For individuals who have limited vision and use sign language, they will need interpreters to avoid clothing with certain colors, certain distracting visual backgrounds, and 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. Note that such appointments may require additional hour and a team of interpreters.

- **Co-Navigator/Intervener/SSP Providing Haptics/ProTactile Cuing Systems**

For individuals with both significant vision and hearing loss, this population will require sight guide services, information about the environment including seating and participants, and various amounts of interactional information (such as audience reactions to the topic or minor interpreting). Professionals who provide these unique services may be arranged to provide only such services or by a RIMS-registered interpreter who are properly trained. There has been an evolution of titles for professionals in this role – latest called as Co-Navigator (began in 2018) and previously called as Support Service Provider (SSP) and, in schools, it is called Intervener. Haptics and Pro-tactile are cuing systems used to convey visual and audio information in real time to the individual who is Deafblind while language is interpreted into sign language.

- **Oral interpreters**

Individuals who are deaf and rely on speech reading to understand and to participate in conversation may not know minimal sign language or none at all. They may prefer oral interpreters. Oral interpreters are trained to help an individual with speech reading and comprehension. Registry of Interpreters for the Deaf (RID) has specific certifications for this type of interpreting. Some sign language interpreters who are RIMS-approved vendor interpreters have this skill although they may not have national interpreter credential. However, sign language interpreters are usually ill equipped to provide this service. When an individual needs an oral interpreter, such request for this service will be clearly stated so the interpreters can determine whether or not they can adequately provide this service.

- **Interpreting for Individuals with Atypical language**

Individuals who are deaf and “at risk” may:

- Not use a standard sign language due to being under-educated, experiencing language deprivation, or having multiple disabilities, or
- Have immigrated and only use a foreign sign language; and for which, VR does not have an interpreter available.

An interpreter providing services for individuals with atypical language are specialized language specialists and use unique interpreting techniques. Careful coordination is required to match a RIMS-approved interpreter with unique needs of individuals with atypical language.

- **Certified Deaf Interpreters/Language Specialists**

Professionals who are deaf and who provide interpreting services are likely credentialed as Certified Deaf Interpreter (CDI) or a Reverse Skills Certificate (RSC) credentials. These professionals work in tandem with a hearing interpreter to communicate between the VR staff or provider and the individual who is deaf and uses atypical language. These interpreters are often used to provide effective and native interpretation for large groups, such as television news broadcasting.

### **Considering Financial Participation with Interpreting as an Exempt Service**

Interpreting services are provided at VR's expense whenever needed regardless of the results of financial participation analysis. VR customers never pay for interpreting services.

### **Determining Whether VR Staff or Providers who can Sign can Provide Interpreting**

VR staff who are not hired as staff interpreters shall NOT provide scheduled interpreting or interpreting for intensive discussion. While VR appreciates having a staff member (e.g., VRC) who can communicate one-on-one with individuals who use sign language. These staff members are not cleared to provide these legally-binding accommodations. The staff member may converse one on one with the individuals after screening and prior approval. A staff member who has questions or would like to be screened to converse in sign language one-on-one without using an interpreter may contact the Deaf, Hard of Hearing and DeafBlind (DHHDB) unit for more information.

Some VR service providers (e.g., job coaches) may know sign language. Regardless of the provider's qualifications, providers should maintain one role when working with the customers. For example, if an employment specialist is accompanying a customer to an interview, the specialist should contact VR to arrange for an interpreter. VR staff will instruct the employment specialists how to request accommodations including interpreting. If a supervisor needs to tell the new hire a simple statement, such as break time, the job coach can provide basic interpreting – but should not attempt to interpret interviews, orientation or other job training or other complex and or lengthy information. Providers will coordinate with the VR staff and the staff interpreter to make sure that appropriate interpreting services are provided for all individuals. The vendor is expected to use the appropriate interpreting request process utilized by the unit the individual is assigned to.

## **Mentoring Interns with Staff Interpreters**

Both staff and vendor interpreters may bring interns to VR assignments. Internships are overseen by the DHHDB unit at VR headquarters. All internships are voluntary and unpaid.

VR staff interpreter interns must follow the Internship process laid out on [www.RehabWorks.org](http://www.RehabWorks.org). First, interns must complete all paperwork, background screening requirements and be approved through VR's Organization and Employee Support (Human Resources). Next, interns will be assigned to work with at least one staff interpreter mentor for the duration of the internship. The mentors must meet the school's required credentials and experience. Staff interpreter mentors will also work with each school's internship coordinator to complete the paperwork for internship.

VR requires a signed legal agreement with each school for each student. Internship begins after the agreement is signed by all parties.

VRCs must obtain consent from individuals before allowing an intern on an assignment. This includes explaining the intern's role and asking the individual to sign relevant Waiver forms. This individual may rescind consent at any time. No intern is permitted to work alone with VR individual.

Information on interns with vendor interpreters can be found in the accompanying guide, *VR Guide for Provision of Interpreting Services for Individuals with Hearing Loss: Part B*, page 9.

## **Recognizing the Difference between Staff Interpreter and Vendor Interpreter**

These two roles differ in rehabilitation process. The staff interpreter is invested in VR mission as a full member of the rehabilitation team. The vendor interpreter provides effective communication to enable VR to comply with ADA, but is not considered a member of the rehabilitation team.

Staff interpreter and vendor interpreters are both expected to adhere to the national RID Code of Professional Conduct (CPC), which direct responsibilities and activities for interpreting. The CPC contains seven tenets including confidentiality, neutrality and conducting themselves in a manner appropriate to the situation among others.

Within VR, staff interpreters are recognized as members of the rehabilitation team. RID recognized this for staff interpreters with a Standard Practice Paper (SPP) titled "Multiple Roles" that outlines what boundaries are for those working as a professional interpreter. Our staff interpreters are charged to work with the rehabilitation team, our customers and other vendors to make it possible for our customers to obtain employment.

The SPP on "Multiple Roles" does not apply to vendor interpreters and, yet, they are required to function within the expectations laid out in the CPC. Our interpreter vendors are tasked to provide service as outlined in the Vendor Registration for that vendor type to provide effective communication to enable VR to meet its ADA obligation.

## **Confidentiality and Vendor Interpreters**

VR staff shall only provide basic information to any vendor interpreter to provide requested interpreting service. On page 26-27 of the *Guidelines for Provision of Interpreting Services*, a list is provided as to what information that VR staff can share with the vendor. In turn, the vendor interpreter (or interpreting agency) shall only report the following information for invoicing, including:

1. Did the meeting occur
2. The duration of the meeting
3. Any additional expenses incurred during the meeting (parking or extended time), and
4. In the rare cases, if communication did not happen (for whatever reason)

VR staff will also need to be aware that, regardless of who the vendor is, VR provides guidelines on release of information and case consulting (*VR Counseling Policy Manual*, Chapter 2, Sections 2.00 and 2.10 and relevant CRCC Code of Ethics tenets). Even with a signed release of information, only information relevant to the service shall be released.

## **Role of the Staff Interpreter**

The staff interpreter is also a subject matter expert (SME) on hearing loss. Staff interpreters maintain the appropriate role of an interpreter and follow the Code of Professional Conduct. The position description of a staff interpreter provides services to the VR staff and community, and includes:

- Interpreting
- Coordinating ASL/English interpreting services while maintaining vendor relations
- Consulting and case conferencing on challenging or new cases
- Training of VR staff and stakeholders, and
- Other activities in which all VR staff engage (including outreach)

The staff interpreter positions around the state are part of a statewide team of interpreters whose program is overseen by the Administrator of DHHDB in Bureau of Field Services at HQ.

**The staff interpreter is a subject matter expert (SME) on hearing loss for the rehabilitation team members and employer.**

## **As a Member of the Rehabilitation Team**

VR staff interpreters serve as an integral part of a rehabilitation team for any individual with hearing loss. The staff interpreter maintains their role within assigned unit(s) in their service area. The staff interpreter serves as a member of that unit even if its supervisor is located at the headquarters. If this is a contracted position, a contractor agency supervises the position, and headquarters DHHDB services oversees the services. Either way, the staff interpreter is part of a VR “family” with which to attend staff meetings and ACED, connect and form professional bonds for day-to-day service to individuals. Staff interpreters shall be invited to all unit meetings and gatherings where all unit staff attend, be requested to participate in activities such as break room cleaning, and be considered as an additional member of the unit. However,

the staff interpreter's duties may prevent them from participating in some of the activities; but, the home-based unit is where the staff interpreter is connected to local VR.

The position description for the staff interpreter lists four core duties: interpreting, coordinating/vendor relations, consulting and training. Each staff interpreter works within this position description to provide services to units within an assigned area and sometimes cross between two areas. Additional information on how each of these core duties are performed can be provided upon request.

### **As a Member of the Statewide Staff Interpreter team**

Staff interpreters are also members of a statewide team of professionals who provide the same services. This team is made up of staff interpreters who serve within all seven areas of VR. These positions are hired as VR Career Service, VR Other Personnel Services (OPS), or contracted full-time interpreters. All staff interpreters are held to same expectations of professionalism, efficiency and collaboration.

## Section 3: Interpreting as a VR Service

### Case Noting

VR considers case notes as the key documentation of the case management process. For individuals with hearing loss, case notes identify how VR attempts to provide effective communication in each meeting in which VR is responsible for effective communication. This requirement to list how communication is provided for all activities in the VR office and in the community including medical, mental health, employment services appointments and job site, wherever VR offers to provide services. Communication provision should be narrated in case notes for each appointment, in reports such as the Monthly Progress Reports (MPRs), and in evaluation reports highly relevant to case management such as psychological or vocational evaluation reports.

### What Communication was Requested

The case notes shall describe the type of communication requested for the case. The customer will identify the expected communication method. If, for example, the individual identifies a need for an interpreter for communication, notes shall indicate how VR provided an interpreter.

### How Communication Occurred

The case note will describe how communication was arranged such as the following:

- A phone call through Video Relay Services (VRS).
- An interpreter present during the appointment (List the interpreter's name. If a vendor interpreter is present, list the interpreter's credential; if staff interpreter, list staff interpreter).
- A walk-in meeting during which the counselor and individual chose to write because no interpreter was available.

VR Staff shall also document in the case notes any decisions about providing or not providing services. These case notes will give detail what steps were taken to ensure effective communication.

### 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 VR-provided qualified interpreter, the VRC 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 reason the individual declined such services.

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

The VRC will outline the following to the individual verbally and, if there is any question of comprehension or accurate interpretation, the counselor is recommended to follow up with an email that outline that:

- The ADA requires that VR provides a qualified interpreter
- Family members and close friends are not neutral so cannot be a qualified interpreter for VR.
- 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. If the VRC is concerned that the individual may not be getting the full and clear message, the VRC may wish to follow up with a call over VRS to speak to the person directly and make sure it is the customer's wishes not to have a VR-provided interpreter. Document the phone call in Case Note. Ask the individual before end of each meeting if the individual would like a VR-provided interpreter for the upcoming meeting. Case Note the request and response.

### **If Interpreting Services are Not Available**

If an individual with hearing loss requests services of a qualified interpreter and, in the unlikely event that no interpreter was 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 suggested someone to interpret for this appointment and 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 DeafBlind Services Program for guidance. All discussions and decisions regarding services provision will be documented in case note

### **When Case Notes are Written by Staff Interpreter**

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 that the individual:

- Is working, but this is not documented in the case file
- Has undisclosed health issues that are relevant to the rehabilitation progress
- Appeared at an assignment inappropriately dressed and/or with poor hygiene and the job coach was not present.

Interpreters adhere to a code of confidentiality while in the act of interpreting. The code is illustrated in the national RID CPC. An exception to this confidentiality code can be found in the VR Employee policies of Confidentiality and Disclosure. (Reference *Counselor Policy Manual* Chapter 2) and is supported by RID SPP “Multiple Roles” as clearly defined and outlined for staff interpreters.

Of significant importance, vendor interpreters have no obligation to disclose any information other than required information for billing purposes to produce the invoice. Actually, disclosing any information that occurs during a customer appointment by a vendor interpreter can be a breach of professional ethics.

**Vendor interpreters have no obligation or responsibility to disclose information other than that which is required for billing purposes to produce the invoice.**

### **If Receiving Email or Phone Requests for Interpreting Services**

Request an interpreter as quickly as possible so as not to unnecessarily delay the appointment. If the staff interpreter’s schedule is in conflict, whomever coordinates interpreters will locate and hire vendor interpreter(s) for the assignment.

It is good practice to inform VR staff that interpreter requests need to be made at least 72 hours prior to a scheduled meeting to allow time to secure services. It is better to have as much lead time as possible so requests will be made as soon as the need is known.

Some interpreter requests may not comply with the 72-hour lead time. Examples are: interpreting a termination/lay off or a highly sought-after job interview where the employer sets the date. If a VR staff member receives a written, email and/or phone request for an interpreter, VR will work diligently to provide an interpreter for the appointment before attempting to reschedule the meeting to a date and time when such an accommodation can be made.

### **Listing Interpreting Services on Individualized Plan for Employment**

An individual who utilizes interpreting services requires “Interpreting Services” listed as a service on the Individualized Plan for Employment (IPE). VR has determined that interpreting services does not require the choice of only one provider on the IPE. Multiple vendors may be added under “Interpreting Services” on the IPE. It is highly recommended that the IPE contain at least three vendor providers who serve in the area, as well as staff interpreter.

An internal-to-VR maintained list of potential providers who are willing to provide interpreting services in the county of need is found in VR’s intranet (VR Avenues) called *Vendor Interpreter Service Area* document. Using Informed Choice and discussion during IPE planning, the VR counselor (VRC) and individual should designate multiple interpreters/ interpreter agency entities for inclusion on the individual’s IPE to provide services for the duration of the rehabilitation plan.

The VRCs are encouraged to become aware as to any local vendors that are available to serve the county/unit as well as the vendors who purport to provide statewide. The staff interpreter can be of assistance to the VRC with information on available specialized services providers such as CDIs or trilingual interpreters.

### **Listing Interpreting Services on IPEs for FSBD Students**

Because individuals who are Florida School for the Deaf and the Blind (FSDB) students reside in St. Augustine during the school year and with their families during vacations and weekends, the IPE must include listing of interpreting services for each location. The IPE written should include VR Staff Interpreters, at least one vendor who serves the home location, and at least two vendors from St. Augustine. Amendments with different interpreters can be completed when the student returns home for good from FSDB.

### **Listing interpreting Services on IPEs for Family Members**

If the interpreting services is not for the VR customer but is for a family-member participating in the individual's rehabilitation process, the IPE shall list both "Interpreting Services" and "Related to Family Services" with a notation for who will be using the interpreting services. Any time this family member will be attending a VR-sponsored appointment, an interpreter shall be provided as requested using the appropriate fee code (G10403).

### **Considering Communication Access with DBS/DVR Dual Cases**

If VR staff refers an individual with both hearing and vision loss to Division of Blind Services (DBS) for possible dual case, VR will provide interpreters in the first meeting when representatives from both agencies meet with the individual to determine how the case will be coordinated.

Each agency will determine expectations and responsibilities for the provision of accommodations. Each agency should also be responsible for interpreter provision for any service-related meetings that are sponsored under a specific agency. 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 requested to ensure effective communications between the agencies' staff, the customer and other parties and/or providers. For more information, refer to the latest Memorandum of Agreement (MOA) FDOE: DBS and VR. For a copy, either contact DHHDB Services Program or find a copy on VR Avenues > Bureaus > Field Services Unit > [Deaf, Hard of Hearing and DeafBlind Services](#)' Main Page under Other Resources.

## **Consulting on Complex Cases**

Non-VR staff interpreters (i.e., VR technicians) who are tasked with the responsibility of coordinating interpreters are strongly encouraged to consult with relevant staff such as a staff interpreter and/or other VR staff (e.g. counselors or consultants) who serve individuals with hearing loss, or DHHDB staff at HQ for assistance with complicated cases.

Assistance may include securing specialized vendor interpreters and providing technical assistance on atypical communication issues in order to ensure that qualified interpreters (including Language Specialist Interpreters also known as Certified Deaf Interpreter) and quality services are provided to match an individual's specific or unique interpreting needs.

## Section 4. Coordinating Interpreting Services

### Coordinating Interpreters

Each VR unit supervisor is expected to designate a staff member to be responsible for scheduling interpreters. The interpreter coordinator role 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 interpreting 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.

If a staff interpreter serves a local office that has an interpreter coordinator, the staff interpreter and coordinator **shall** work together **schedule assignments for the staff interpreter when possible**. The office may hire vendors when the staff interpreter is unavailable.

### Typical Standards for Interpreter Requests

Staff interpreters typically coordinate interpreting assignments for several designated units. The staff interpreter and/or the interpreter coordinator determine the best way for units and vendors to request interpreters. All interpreter requests must adhere to VR's standards of confidentiality.

It is good practice for VR staff to submit interpreter requests at least 72 hours (three business days) or more before the date of the assignment. The earlier, the better, in case the staff interpreter cannot accept the assignment and it needs to be sent out to a vendor. Each area should work with their staff interpreter to determine if this standard needs to be longer. Staff interpreters

In order to submit a request to the Staff Interpreter, the VRC, VR Technician, or other designated VR staff will need to compile the following information:

- Date, time and expected duration of the appointment
- Individual's name and VR ID number
- Individual's VRC and or VR technician's name
- Service provider's name
- Assignment location: Exact address including floor and suite, parking arrangements.
- Point of contact onsite to respond to questions or provide relevant preparation material, if any, before the assignment
- Specific type of assignment (e.g. employment, training, medical, mental health, evaluation).
- Any unique communication needs that are relevant (e.g., tactile interpreting, low vision, oral, atypical language user).

Note: Do not share an individual's name or personal information with a vendor until the vendor accepts the assignment. Even then, make sure to encrypt any email correspondence to vendors with such information. See "Scheduling with Vendor Interpreters" later in this chapter.

## **Scheduling for Complex Assignments and Assignments Lasting Longer Than an Hour**

A team of two interpreters may be considered for any assignment that exceeds one hour, and is expected to be scheduled 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 dense information lasting longer than an hour, a team of interpreters may be necessary. Below are team scenarios:

- 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 (e.g., licensure exams, hands-on training), one interpreter may be sufficient. The decision to hire only one interpreter **must** be communicated to the secured interpreter prior to confirmation of the assignment.
- A team of interpreters consists of at least two interpreters working together on the same assignment. This technique is required to maintain the quality and effectiveness of the interpreting product. Teaming interpreters alternate interpreting approximately every 15-20 minutes. The interpreter actively interpreting not 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 RID Standard Practice Papers regarding Teaming and Repetitive Motion Injuries on the internet.
- 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 interpreters, see Specialty Interpreting Services.
- 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.

## **Interpreting for Office Walk-ins**

If an individual arrives at an office without a scheduled appointment and needs interpreting services, then 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 their convenience. It is important to allow for sufficient time to schedule an interpreter. Follow the coordination procedures outlined above to confirm at appointment with the individual.

## **Use of Case Notes to Monitor Appropriate Accommodations**

VR considers case notes as the key documentation of the case management process. For cases involving individuals with hearing loss, case notes stating how VR attempted to provide effective communication in each appointment, shows that VR understands its responsibility for

effective communication. VR is required to document arrangements for effective communication for appointments in the VR office, in the community, and wherever VR offers to provide services. For interpreting services, the case notes will always list the name of the interpreter who provided services. If it is a vendor interpreter, case notes will also identify the credentials that the interpreter holds. If the interpreting is provided by the Staff Interpreter, only “Name, Staff Interpreter” will be sufficient.

### **Preparation Materials for Interpreters**

If the interpreting assignment is a meeting/training that has an agenda or materials, every effort will be made for these materials to be provided to the assigned interpreter before the appointment. This practice makes it possible for the interpreter to be better prepared and to produce a more accurate interpretation of the message.

### **Scheduling with a Staff Interpreter**

Good communication and coordination will ensure appropriate and efficient use of the professional staff interpreter in any appointment.

### **Staff Interpreter’s Daily and Weekly Schedule**

- All staff interpreter positions follow a standard business work-week schedule and observe official state holidays unless otherwise noted on the advertisement (e.g., part-time).
- Assignments outside of the established permanent work schedule (e.g., evening, weekend and holidays) may be considered by staff interpreters who may either accept or decline based upon their availability.
- All State of Florida Personnel Rules are to be followed, including the Fair Labor Standard Act (FLSA), as appropriate.

### **Staff Interpreter as a Team Member**

Staff interpreters are part of the rehabilitation team. Hence, they take staff trainings, attend staff meetings and engage in area events (e.g., ACED). If a VR staff member who is Deaf needs interpreting for those events, the VR staff interpreter may arrange vendors. This will allow the staff interpreter to participate fully in VR activities.

### **Considerations When Scheduling the Staff Interpreter**

Staff Interpreters work with multiple counselors, serve multiple units and interpret out-of-the-office at multiple locations. When scheduling appointments at more than one location, staff interpreters must build in time for lunch and reasonable drive time to and from different locations. The staff interpreters have experience with negotiating transit time, navigating in local traffic and handling other challenges associated with getting in and out of facilities.

Because of these considerations, the staff interpreter is solely responsible to manage their work schedule and will advise as to how much time is reserved for each requested assignment.

## Considerations for Not Scheduling the Staff Interpreter

As with any service professional, the interpreters' code of ethics (called Code of Professional Conduct) outlines that, at times, the interpreter professional may determine that they are not an appropriate fit for a particular assignment or a particular customer. Staff interpreters carefully consider a situation before recusing themselves. Other VR staff should not unilaterally decide for the staff interpreter on these matters. If there is a need to meet and discuss a situation, contact the staff interpreter's supervisor to be included in the meeting.

- **Family Member Conflict of Interest:** VR has a relevant policy on serving family members or other intimates (*Counselor Policy Manual 1.13*) that outlines a strict "firewall" between staff members and family members/other intimates who are accessing VR services. Staff interpreters shall disclose any conflicting relationships (as outlined in the policy) to the VRC and unit supervisor and interpreter's supervisor. Staff interpreters should not interact with their family member's case in any way – including pulling up the case file in RIMS, coordinating interpreting services for any appointments, or providing consulting if the name is disclosed. Interpreters must identify another staff interpreter or VR technician who will coordinate interpreters and ways to have consulting on the case as needed. This may also happen with any customer who is deemed to be too close to the staff interpreter for confirmed neutrality.
- **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. Some assignments require specific training or credentials (e.g., psychological assessments, mental health counseling).
- **Professional Ethics/Conflict of Interest:** The interpreting CPC allows staff interpreters to decline an assignment when he/she cannot ethically provide high quality interpreting because of the subject matter, communication needs or individuals involved. If a staff interpreter believes there is a conflict of interest in providing services to a particular individual, every effort will be made to find a substitute interpreter.

## Scheduling for Simultaneous Appointments When a Staff Interpreter is Available

When two appointments are scheduled at the same time in which both require interpreting services, first 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 is likely that 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 may be scheduled with a vendor interpreter instead.

### **Setting Appointments in Order to Only Use the Staff Interpreter**

If the staff interpreter's schedule is in conflict with a scheduling need, individual services will not be delayed due to the staff interpreter's unavailability. VR staff will make alternate arrangements 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, quickly hire a vendor interpreter for necessary assignments. Cost and distance should not prevent hiring of a vendor interpreter to avoid needless delay.

### **Staff Interpreter and Making Appointments**

Staff interpreters are integral parts of the scheduling process to best utilize their schedule. Staff interpreters usually coordinate assignments that they cannot themselves fill. In the rare situations where there is another designated interpreter coordinator, this coordinator should work closely with the staff interpreter to balance the Staff Interpreter's availability and NOT delaying services.

### **Trilingual Staff Interpreters and Spoken Language Interpreting**

Some staff interpreters may be fluent in a third language. The staff interpreter positions are primarily hired for ASL/English interpreting. However, on occasion, these professionals may be asked to provide the spoken language/English interpreting as long as it does not interfere with ASL/English interpreting needs.

No interpreter should be expected to work with all three languages in the same appointment. They may generally accept an assignment involving only English/ASL, ASL/other spoken language or English/other spoken language. If all three languages are required for the assignment (e.g., a mother who speaks Haitian Creole, a deaf transition student and an English speaking VRC), the staff interpreter may accept the combination of two languages that is best suited to the situation. One scenario may be that there is difficulty securing a Haitian Creole/English interpreter (called Bilingual interpreter in RIMS), the staff interpreter may choose to accept the Haitian Creole/English part of the assignment and secure a vendor interpreter to assist with the English/ASL part of the assignment.

## **Scheduling with Vendor Interpreters**

If a staff interpreter works with the office, to the extent possible, the staff interpreter and the interpreter coordinator will work jointly to match an individual's linguistic needs with vendor interpreters' skills and abilities. This approach ensures effective communication access.

Some individuals have unique language needs, and such needs must be addressed in order to appropriately match interpreters for most assignments. If a staff interpreter does not work with an office, and the customer needs the services of a specialized interpreter, the designated interpreter coordinator may contact DHHDB staff for guidance on arranging services to ensure effective communication.

## **Maintaining Confidentiality While Coordinating Interpreters**

In order to maintain confidentiality to the full extent possible, the vendor will at first, 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 (e.g., tactile interpreting, low vision, oral, high visual)

## **Utilizing an Online Request Form**

Some interpreting agencies use online interpreter requests forms. These online request forms may or may not be secure. While there are ways to determine if a website is secure, it is best practice to list no personal identifying information (PII) of the customer on the form. Where required, list either coordinator's information OR list "information available in phone call." This should eliminate any accidental breach of confidentiality.

## **Finalizing Confirmation for Services**

Once the vendor interpreter has accepted the interpreting assignment, confidential details can be shared via encrypted email or phone call including:

- Names of deaf and hearing participants
- Exact address of the assignment
- Information relevant to processing the authorization
- Preparation materials (e.g., agendas, PowerPoint, handouts, contact information) for the person handling material distribution for follow up, which are extremely important when interpreting for trainings.

Once confirmed:

- Verify the interpreter/agency's policies for cancellation and consequences of either person's failure to appear ("no show") when confirming the appointment in order to generate the authorization (or purchase order, if relevant).
- Remind the interpreter service agency to list the interpreter and credential on the invoice for payment.
- If the interpreter is scheduled through an interpreter service agency, the interpreter coordinator will remind the agency of VR's requirements and will verify the interpreter's name that the agency provides. The name should appear in RIMS on the agency's Contact List as Certified.
- When an appointment is finalized, the VR staff member will follow the guidelines in Section 6: Vendor Interpreter Payment Procedures to process payments.

### **Verifying That Interpreters Are Listed in RIMS**

VR's Vendor Registration requirements indicate that any interpreter for VR assignments must be cleared through the state's Agency for Health Care Administration (AHCA) Care Provider Background Screening Clearinghouse with a Level-2 background screening. Once an interpreter's name is provided as assigned to interpret an appointment, interpreter coordinator needs to verify that the name is listed under that agency or as individual vendor in the Vendor Directory (See Purchasing Interpreting Services Guide for additional information).

If the interpreter's name does not appear in RIMS, that interpreter is not cleared to provide interpreting services for VR. If this happens, notify the interpreter or interpreter agency of the discrepancy. The interpreter or the interpreter agency may be able to contact Vendor Registration and, in some cases, it is possible for the interpreter to be added at that time.

All interpreters who are paid for by VR must be listed in RIMS on the contact list as Certified within RIMS.

### **An Important Note on Possible Scenarios with Vendor Interpreters**

The profession of interpreting has a standard called Appearance Fee. Appearance Fee is a term defined in the Appendix Glossary and the payment processes are described in the accompanying guide "Purchasing Interpreting Services." **This fee is not a designation of time; it is a charge for access to services.** Regardless of the appearance fee, all appointments have confirmed start and stop times to represent the commitment that the interpreter has agreed to fulfill. The interpreter is committed 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 a.m. – 10 a.m. (EDT), find below some of the possible issues that can occur. A VR technician has generated an authorization for the professional appearance fee for the interpreter.

## Vendor Scheduling Scenarios

<p>If an appointment is delayed until (for example) 9:30 a.m. and will not end at the expected time</p>	<p>The interpreter is asked if he/she/they can stay beyond the scheduled 10 a.m. The interpreter may need to leave the assignment at the end of the confirmed appointment time (e.g., confirmed as 10 a.m.) regardless of the completion of the appointment and can invoice for his/her/their appearance fee.</p> <p>If the interpreter is able to wait for the late appointment, the interpreter will invoice for the entire time spent at VR. The authorization may need to be adjusted or cancelled and reissued so that the full amount can be paid.</p>
<p>If the assignment completes before the end of the agreed time and there are no other appointments scheduled.</p>	<p>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 who either has a hearing loss or is hearing person is declared a “no show”. The standard waiting time is typically 20-30 minutes. VR should ask for the vendor interpreter’s “no show” policy when confirming arrangements. The interpreter can invoice for his/her/their appearance fee or full term of request.</p>
<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 CPC that requires the interpreter to accept assignments based on an assumption of no conflict of interest and other standards. In order to avoid these situations, interpreters will typically ask for the individual’s name. An interpreter who accepts in advance for a “walk-in” assignment understands the implications of possible conflict-of-interest or other 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 (1) a blanket purchase order for employee accommodations (if any) or (2) an after-the-fact purchase order.</p> <p>If the interpreter does not/cannot agree to interpret for the staff member, the original authorization for individual services will be processed for payment as an individual “no show.”</p>

Last minute changes to the assignment with the vendor interpreter (e.g., adding another customer, being on call for walk-ins, interpreting for staff) are not recommended. In addition, if the interpreter accepts, this change requires reprocessing of authorizations or additional invoicing to purchase orders to equal the amount of time (not number of assignments) that the interpreter is present in VR.

## **Contracting DHHDB Services Unit for Technical Assistance**

To receive technical assistance concerning all issues covered in this guide as well as other issues related to services to individuals with hearing loss, contact the DHHDB Services Program at VR Headquarters.

Contact information for DHHDB Unit:

- Headquarters' main line: 850-245-3399 (Voice/VRS)
- Email: [DHHDBConsults@vr.fldoe.org](mailto:DHHDBConsults@vr.fldoe.org)

## Appendix A. Glossary of Terms

### Hearing Loss Population

Hearing loss is not “one size fits all.” Here are some unique groups you may encounter within the hearing loss population.

**Capital “D” Deaf:** Individuals who are members of the Deaf Culture who use sign language to communicate. Their preferred peers are Deaf. They use sign language interpreters as well.

**Lowercase “d” deaf:** Individuals who are not members of the Deaf culture and do not use sign language to communicate. They lack the ability to hear but rely on speaking, speech-reading and technology to communicate. Their preferred peers are hearing.

**Late-Deafened:** Individuals who lost their hearing later in life due to genetic conditions, illness or accident. They are part of the lowercase “d” deaf group.

**Hard of hearing:** Individuals who have some hearing remaining (this is called “residual hearing”). They may use spoken language, speech-reading and technology (hearing aids and FM systems) to communicate.

**Deafblind:** Individuals who have lost both hearing and vision. A person does not have to be totally deaf and totally blind to be considered “DeafBlind”. There is a spectrum of combined hearing and vision loss.

**Deaf Plus (also known as Deaf Disabled):** Individuals who are Deaf but have additional disabilities. These disabilities could be emotional, developmental, cognitive, orthopedic or psychological. Communication for these individuals is unique and complex.

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

### General Vocational Rehabilitation Terms

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

**Individual/Customer/Consumer/Client:** A VR client receiving any aid, benefit, service or training through any program or activity of VR; any participant in VR activities.

**FDOE:** The Florida Department of Education under which the Division of Vocational Rehabilitation is housed.

**Effective Communication** - 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.

**Pre-ETS:** Pre-Employment Services Training that is available to transition students age 14- 21. The student enrolled in Pre-ETS can be a customer or can be potentially eligible for services and still receive specific trainings.

**RIMS:** The state VR database for case management.

**Stakeholder:** An individual who has a vested interest in the outcome of a particular case or the VR program in general. These roles may include parents, spouses, children, advocates, employers, vendors, or community members involved.

**VR:** Division of Vocational Rehabilitation.

## **Interpreting**

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

**Contracted Staff Interpreter:** An employee who functions as a full-time staff interpreter (also see definition of staff interpreter below) working with VR offices through a contract agreement. The interpreters employed under a contract shall be treated as members of VR staff and not considered as outside providers.

**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.

**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 statewide team who provides interpreting services to individuals with hearing loss and/or VR 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 VR Counselors and staff to ensure that individuals with hearing loss receive all necessary referrals, accommodations and services.

**Vendor Interpreter:** A qualified service provider who meets VR’s standard for vendor qualifications. Registered vendor ASL/English interpreters are found in *RIMS Vendor Directory* under Interpreters for the Deaf.

## **Stevens Amendment**

The Florida Department of Education, Division of Vocational Rehabilitation (VR) is an equal opportunity employer. It is against the law for VR as a recipient of Federal financial assistance to discriminate against any individual in the United States on the basis of race, color, religion, sex, national origin, age, disability, political affiliation or belief. The Rev. March 2021 3 application process used by VR to determine eligibility for services, any subsequent services and the entire VR process are subject to these non-discrimination requirements. Auxiliary aids and services are available upon request to individuals with disabilities. VR program receives 78.7 percent of its funding through a grant from the U.S. Department of Education. For the 2021 Federal fiscal year, the total amount of grant funds awarded were \$176,836,896. The remaining 21.3 percent of the costs (\$47,860,557) were funded by Florida State Appropriations. Revised October 2021.