

Disability Accommodation Requests for Sign Language Interpreters (SLIs)

Understanding Effective Communication

Communication with people with disabilities (whether those people are students, staff, applicants for admission /employment, parents, guardians, or members of the public) must be <u>as effective as</u> communication with others. This obligation applies to all stages of the Job Corps process.

The obligation to communicate effectively with people with disabilities is **separate** from the obligation to provide reasonable accommodation or reasonable modification in policies, practices, or procedures for qualified individuals with disabilities. The Workforce Innovation and Opportunity Act (WIOA) nondiscrimination regulations distinguish between these two obligations for a very simple reason: Without clear, accurate, effective communication, any encounter between a person with a disability and a program from which that person is seeking services, such as Job Corps, will be literally meaningless.

Under the law, the burden is on Job Corps to provide the auxiliary aids and services (communication aids) that are needed for equally effective communication with a particular person with a disability.

Determining Effective Communication

When a person has a specific disability that affects their ability to communicate applies to Job Corps, **first** determine **how to communicate** as **effectively with that person** as you would with a person without a disability. This requires engaging the individual in an interactive disability accommodation process to determine the communication methods the person can genuinely understand. It is important to give **primary consideration** to the communication requests of the

individual
with a
disability as
they are the
best source
of information
about their
own needs.
Individuals
who have the

Keep in mind that the individual may need communication accommodations to participate in the admissions process, center tours, the disability interactive process, etc.

"same" diagnosis or disability may not be able to use and understand the same communication method and some communication methods/needs are more obvious than others. Be mindful of the different communication preferences and approaches and do not attempt to apply a "one type fits all" strategy. Schedule a meeting with the individual to discuss their communication needs.

Requesting National Office Funding for High-cost Disability Accommodations

(1)

Contact your Regional Disability Coordinator!

When the center is notified of an applicant/student that needs an SLI, contact your Regional Disability Coordinator (RDIC) first!

The RDIC sets up a teleconference to review the process for providing a SLI and for requesting National Office funds to pay for SLI services.

<u>Do not</u> contact the applicant or start securing quotes UNTIL you have had a teleconference with your RDIC.

2

Review the Email from the RDIC Before the Teleconference!

You will receive an email from your RDIC that contains the Sign Language Interpreter/Assistive Technology Accommodation Funding Request Support Form prior to the teleconference. Review the form.



Participate in the RDIC Teleconference.

The RDIC reviews the Sign Language Interpreter/ Assistive Technology Accommodation Funding Request Support Form and the funding request process steps during the teleconference.



Review the Follow-up Email from the RDIC.

The RDIC emails the center follow-up technical assistance after the teleconference that includes detailed guidance on obtaining quotes and completing the Sign Language Interpreter/Assistive Technology Accommodation Funding Request Support Form.

Schedule a Disability Accommodation Meeting (DAC).

Schedule a Disability Accommodation Committee (DAC) meeting with the applicant/student. See the Engaging in the Interactive Process section in PRH Form 2-03 for general guidance on conducting a DAC meeting.

(6)

Submit Required Documents to the RDIC.

(See pages 3 and 4 for technical assistance)

List of documents to be submitted to the RDIC include:

- Completed Sign Language
 Interpreter/Assistive Technology
 Accommodation Funding Request Support
 Form (Emailed to the center by the RDIC)
- Completed Reasonable Accommodation, Reasonable Modification in Policies, Practices or Procedures, and Auxiliary Aids and Services (RA/RM/AAS) Request and Disability Coordinator Contact Form (See Form 2-03)
- Disability documentation
- Two Sign Language Interpreter quotes
- Two quotes for any other items that the applicant is requesting (e.g., iPad, bed shaker alarms, etc.)



Confirm Accuracy of Submitted Information.

The RDIC reviews and then emails the Center Director and DCs the Interpreter Scheduling Spreadsheet and Regional Disability Coordinator Analysis to confirm they are accurate. After the center confirms the information is accurate, the RDIC submits the funding request to the National Office and follows up with the center if additional information is needed. The Regional Office informs the center of the outcome of the funding request.

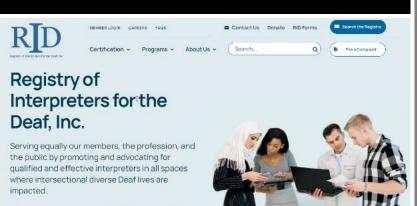
Gathering Required Information

Please ensure that you have contacted your RDIC, participated in a teleconference with them, and received a follow-up email from them containing detailed guidance before proceeding to gather the necessary documents/ information. If you have not, stop, and do so before proceeding.



How to Secure a Sign Language Interpreter?

Once you have your initial teleconference with your RDIC, contact SLI agencies to obtain at least TWO quotes. A good place to start is usually the Registry of Interpreters for the Deaf which can be found at rid.org (see snapshot below). At the RID website, you can search your regional area for sign language interpreters. Other options for securing a SLI include contacting a local disability agency for resources (e.g., vocational rehabilitation agency) or a "Google" search for SLI services in your area. **Document** the agencies you contact and the outcome of each contact.



Collecting Sign Language Interpreter Information

Sometimes SLI agencies will indicate two interpreters are necessary. Explain that only one interpreter is necessary!

Why? The Job Corps Program is largely comprised of self-paced and hands-on programming, with minimal lecture style instruction. Even though the interpreter will be on center with the student throughout the training day, continuous interpretation services are rarely needed.

It may be beneficial to invite the interpreter agency to Job Corps to observe a typical academic and trade class.

Quotes and Mileage Charges

- SLI quotes must be for a single hourly rate (e.g., \$60) and may not be provided in hourly ranges (e.g., \$40-\$60).
- The quote should clearly explain how charges are determined (e.g., differences between charges for business hours, after hours, weekends).
- Mileage charges must include when mileage charges are applied (e.g., charges are incurred if the location is over 30 miles away, charges incurred no matter the distance, etc.). Ensure you determine the distance from the SLI's location to the center in case there are mileage charges.
- Mileage charges must also be clearly defined. The quote must state the amount of the mileage charge (e.g., amount per mile) and at what time increments it applies to (i.e., every 15 minutes or some other timeframe). If mileage charges initiate when the mileage is a certain distance, the specific distance and the charge must be stated in the quote.



Other Potential Communication Options

Video Remote Interpreting (VRI)

VRI uses videoconferencing technology, equipment, and a high-speed Internet connection to provide the services of a qualified interpreter to an individual who is at a different location. VRI is currently being used in a wide variety of settings including health care settings, schools, and the workplace.

An individual may request Video Remote Interpreting or VRI. If an applicant/student requests Video Remote Interpreting (VRI), please collect the following information:

At what times and how often is the applicant/student requesting access to VRI?

Does the quote clarify if they charge by minute or hourly for VRI service?

What is the purpose of accessing VRI (e.g., for emergencies, all hours that an interpreter is not present)?

Is there any equipment or additional supports needed that may also incur a cost?

Does the sign language interpreter quote provided include VRI? If not, the center will need to reach back out to the interpreters to request a quote for VRI and ensure the interpreter agency is able to provide the service.

Important Reminders!

- Do <u>not</u> tell an applicant that Job Corps does not provide Sign Language Interpreters (SLIs).
- Do <u>not</u> refer an applicant who may need a SLI to another center.
- Do <u>not</u> enroll an applicant who needs a SLI prior to completing the process for requesting National Office funding for high-cost disability accommodations.

Nearly all requests for National
Office funding for high-cost disability
accommodations are for
SLIs/assistive technology.

For any other requests, the center should email their RDIC to determine the documentation that will be needed to support the request.