

Responsibility:  
CWU Center for Disability Services

Effective Date: 1-6-10

Reviewed by:  
President's Advisory Council

Authority:  
Section 504 of the Rehabilitation Act of 1973 and  
Title II of the Americans with Disabilities Act of 1990.

Approved by:  
Charlotte Tullos, VP, SAEM

**COMMUNICATION ACCESS SERVICES  
FOR DEAF & HARD OF HEARING STUDENTS—  
POLICY AND PROCEDURES**

**I. POLICY**

Central Washington University is committed to ensuring that deaf and hard of hearing students, and students with other disabilities, are afforded equal access to campus facilities, services, and programs in compliance with the Americans with Disabilities Act, Section 504 of the Rehabilitation Act, and the Washington Law Against Discrimination.

**A. Provision of Auxiliary Aids and Services**

In furtherance of this policy, CWU's Center for Disability Services (CDS) furnishes appropriate auxiliary aids and services where necessary to ensure that deaf and hard of hearing students have access to communications that are as effective as communications with others and that affords such students an equal opportunity to participate in and enjoy the benefits of CWU's programs and activities.

CDS participates in an interactive process with students to make an individualized determination regarding the appropriate auxiliary aids and services for each student. This interactive process takes into account the nature and extent of the student's disability, the nature and complexity of each of the student's courses, the way that information is conveyed in the classroom environment, and what aids or services will provide accurate, concurrent, and relatively complete conveyance of classroom information.

In determining what auxiliary aids and services are necessary, CDS will give primary consideration to each student's request for auxiliary aids and services. However, CDS need not provide the specific aids and services that are requested if CDS can provide alternative aids and services that are equally effective as the requested aids and services. Further, CDS need not take any action that would result in a fundamental alteration in the nature of CWU's services, programs, or activities, or that would impose undue financial and administrative burdens, or that would constitute a direct threat to the health or safety of others.

CDS will provide in a timely manner the auxiliary aids and services that CDS has determined appropriate for each student. CDS will also ensure that a student's auxiliary aids and services, including speech-to-text transcriptions, are complete and accurate. If concerns arise

regarding a student's auxiliary aids and services, such as interruptions or delays in services, CDS will work with the student and instructors to ensure that the student is promptly provided the auxiliary aids and services that the student needs to participate effectively in the program. CDS will identify the employee(s) responsible for receiving and resolving such concerns and will promptly address and resolve such concerns.

CDS will clearly inform students of the procedures and requirements for requesting auxiliary aids and services, including the information needed to support such requests, the time frames applicable to such requests, and the process for addressing concerns and complaints about the provision of auxiliary aids and services. This information is provided in the **"Procedures"** section of this policy (**Section II** below).

### **B. Prohibition Against Retaliation**

CWU policy strictly prohibits anyone from intimidating, threatening, coercing, or discriminating against individuals, including students, because they opposed any act made unlawful by federal or state laws against discrimination; or because they made a complaint of disability discrimination; or because they exercised or encouraged another individual to exercise a right protected by federal or state laws against discrimination.

### **C. Discrimination Complaint Procedures**

Complaints of disability discrimination, including complaints of retaliation, may be resolved under the CWU discrimination complaint procedures. See **CWU Policy 2-2.2.2** ("Nondiscrimination Policies Pertaining to Students") and **CWU Policy 2-2.2.3.1** ("Equal Opportunity Grievance Procedures"). For copies or information about these policies, contact the Director of the CWU Office for Equal Opportunity: **Barge Hall 211, Phone 509-963-2205, email: oeo@cwu.edu.**

## **II. PROCEDURES**

The CDS Communication Access Program ensures equal access to classroom and other educational activities for deaf and hard of hearing students by furnishing appropriate auxiliary aids and services, such as sign language interpreters, speech-to-text transcription services, and/or adaptive equipment. CDS works cooperatively with the student, faculty and staff members, and interpreters or transcribers to facilitate these accommodations. The following procedures describe the responsibilities, as applicable, of CDS, the student, faculty and program staff, and interpreters or transcribers.

### **A. Student Responsibilities**

Students requesting accommodations must provide CDS with appropriate medical documentation of their hearing impairment so that CDS can verify the student's eligibility for appropriate auxiliary aids and services, such as a sign language interpreter, speech-to-text transcription services, or adaptive equipment (e.g., wireless FM transmitter/receiver).

Medical documentation must include a written evaluation from a physician, audiologist, or other qualified specialist that establishes the nature and extent of the hearing impairment, as well as the current need for accommodations. If the documentation is incomplete or unclear, CDS may request updated or additional information and/or the student's permission to consult directly with the student's medical provider. CDS reserves the right, if necessary, to require an independent medical examination at CWU's expense.

Students must notify CDS of their needs in a timely manner. **This is particularly important when sign language interpreters and/or in-class transcribers are required.** Students should provide their class schedule to CDS as soon as possible after early registration. Interpreter or transcription services on the first day of class cannot be guaranteed for students who do not submit timely requests.

Speech-to-text transcription services may not be appropriate for every student or for every class. The CDS Coordinator of Communication Access Services (Ellensburg campus and Eastside centers) or the Coordinator of CDS Westside Operations (Westside centers) will assign speech-to-text transcription services based on student need and the content of the course for which speech-to-text transcription has been requested, taking into account the student's preferences, the nature and extent of the student's disability, the nature and complexity of each of the student's courses, the way that information is conveyed in the classroom environment, and what aids or services will provide accurate, concurrent, and relatively complete conveyance of classroom information.

Students must inform course instructors of their need for auxiliary aids and services by providing each instructor with a copy of the CDS Confirmation of Eligibility for Academic Adjustments that the student receives from CDS. Instructors are not required to make academic adjustments for students who have not been approved for services by CDS.

Students using sign language interpreters and/or speech-to-text transcribers are expected to attend all classes. Students who must miss class due to illness or other emergency are expected to notify CDS and their assigned interpreter(s)/transcriber(s) **at least one hour before class begins** to avoid an "unexcused" absence. Students who anticipate a planned absence from class must notify CDS and their interpreter(s)/transcriber(s) **at least 48 hours before class** to avoid an "unexcused" absence.

Students are also expected to arrive on time to all classes. If students are more than 10 minutes late for a one-hour class, the interpreter/transcriber will leave class and report to CDS for reassignment. Students are expected to contact the CDS Coordinator of Communication Access Services (Ellensburg campus and Eastside centers) or the Coordinator of CDS Westside Operations (Westside centers) after conclusion of that day's classes to discuss attendance.

Interpreter and/or transcription services will ordinarily be suspended when a student has **three unexcused absences** from class. Students with three unexcused class absences must meet with the CDS Coordinator of Communication Access Services (Ellensburg campus and Eastside centers) or the Coordinator of CDS Westside Operations (Westside centers) to reestablish services. Any further unexcused absence following the reinstatement of services will again

result in the suspension of services pending another meeting with the Coordinator of Access Services.

Interpreters and transcribers are not subject matter experts and do not function as tutors or teaching assistants. Students should direct their academic questions to the course instructor, not to the interpreter/transcriber.

Students should avoid talking to the interpreter while he/she is interpreting with the exception of asking for repetition or clarification. If students have difficulty understanding the interpreter's signs, they should speak with the interpreter after class. If the problem is not resolved, contact the CDS Coordinator of Communication Access Services (Ellensburg campus and Eastside centers) or the Coordinator of CDS Westside Operations (Westside centers), who is responsible for addressing the student's concerns.

Students needing interpreting or speech-to-text transcription services for meetings or events outside the classroom must submit a request to CDS in a timely manner. These events **must be related to CWU sponsored programs or activities.**

The student's failure to follow the procedures outlined above may result in the denial or suspension of services.

## **B. CDS Responsibilities**

Requests for communications access accommodations must be approved by CDS. Accommodations are determined on an individualized basis, taking into account the needs of the student, the nature and extent of the student's disability, the essential requirements of the CWU course or activity, the way that information is conveyed in the educational environment, and what aids or services will provide accurate, concurrent, and relatively complete conveyance of orally communicated information. Appropriate accommodations are determined by CDS in consultation with the student and with input from faculty and program staff as needed.

CDS will provide assistive listening devices to students who can effectively utilize such devices. CDS may request recommendations from the student's audiologist with regard to adaptive equipment.

CDS will identify and assign qualified sign language interpreters and speech-to-text transcription services to provide "real time" communication access to students who require such services to enjoy equal access to CWU's programs and activities. CDS will assign interpreters and speech-to-text transcription services based on the qualifications, expertise, and availability of the interpreters and transcribers.

Generally, upon request, students who use meaning-for-meaning transcription services will be provided with a copy of transcripts in place of notetaking assistance. In contrast, students who use word-for-word transcription services will, as appropriate, be provided notetaking assistance as well as in-class "real time" transcription, but they will not be provided with copies of the transcripts. The university will ensure that transcription services are complete and

accurate. Students using word-for-word transcription services will be not be provided with copies of the transcripts, but may be provided with notetaking assistance (see CDS Notetaking Policy and Procedures).

CDS will attempt to provide each student with his/her preferred method of communication access. When this is not possible or appropriate, the CDS Coordinator of Communication Access Services (Ellensburg campus and Eastside centers) or the Coordinator of CDS Westside Operations (Westside centers) will collaborate with the student to identify an equally effective service.

Students who have questions, concerns, or complaints about their auxiliary aids and services are encouraged to contact the CDS Coordinator of Communication Access Services (Ellensburg campus and Eastside centers) or the Coordinator of CDS Westside Operations (Westside centers) as soon as possible to ensure that such concerns can be promptly and effectively addressed. Contact information: **Bouillon Hall 205, Phone 509-963-2171, email: CDSrecept@cwu.edu.** (Also see **Complaint Resolution Procedures, Section II.E** below)

### **C. Interpreter/Transcriber Responsibilities**

Interpreters and transcribers must arrive on time and attend all scheduled classes or other interpreting/transcribing assignments. Interpreters or transcribers who must miss class due to illness are expected to notify CDS **by 8:00 a.m. on the day to be missed** and, whenever possible, suggest a replacement.

If a scheduled class is canceled or the student is absent, the interpreter/transcriber must report to CDS for reassignment. Interpreters and transcribers who anticipate a planned absence are expected to notify CDS and their student(s) **at least 48 hours before class** and, whenever possible, suggest a replacement.

To the degree possible, interpreters and transcribers will avoid behaviors that call attention to the students' disability and will work with the student and faculty member to achieve appropriate placement in the classroom.

Interpreters and transcribers must keep all assignment-related information **strictly confidential**. Interpreters will "render the message faithfully," conveying the content and spirit of the speaker, using language most readily understood by the person(s) they serve. Interpreters/Transcribers must not attempt to counsel or advise, interject personal opinions, or "tutor" students.

Interpreters and transcribers will accept assignments using discretion with regard to skill, setting, and the consumer(s) involved. The interpreters/transcriber is expected to maintain high professional standards in compliance with the Code of Ethics of the CWU Student Affairs and Enrollment Management Division (SAEM).

Interpreters and transcribers are further subject to the “CDS Speech-to-Text Transcriber/Sign Language Interpreter Operating Guidelines” and other applicable employment policies.

#### **D. Faculty and Staff Responsibilities**

Faculty and other CWU program staff work cooperatively with CDS and with deaf and hard of hearing students to ensure that classroom or other program communications are as effective for such students as they are for other students.

Accommodating the communication access needs of a deaf or hard of hearing student may require adjusting the delivery of information in a classroom or other setting. A course instructor, for example, may need to wear a microphone and may need to moderate classroom discussions to ensure that questions are repeated and that only one person speaks at a time. CDS Coordinator of Communication Access Services (Ellensburg campus and Eastside centers) or the Coordinator of CDS Westside Operations (Westside centers) is responsible for working with the student and faculty member to ensure that classroom accommodations are properly implemented.

If a student requires note-taking services to enjoy equal access to classroom or other activities, faculty or program staff may be asked to assist in identifying one or more individuals to perform that function.

If the student uses an interpreter or transcriber for classroom or other CWU program activities, course instructors or program staff should speak directly to the student and should not address their questions or comments to the interpreter/transcriber. The interpreter/transcriber serves as a means of communication only.

Faculty and program staff are not expected to make academic adjustments or other accommodations for students who have not been approved for services by CDS. Faculty and staff are encouraged to contact CDS if they have questions or concerns about a student’s accommodations.

#### **E. Complaint Resolution Procedures**

The CDS Coordinator of Communication Access Services (Ellensburg campus and Eastside centers) or the Coordinator of CDS Westside Operations (Westside centers) is responsible for responding to student questions, concerns, or complaints about their auxiliary aids and services. Students are encouraged to contact the CDS Coordinator as soon as possible to ensure that such concerns can be promptly and effectively addressed. **Contact Bouillon Hall 205, Phone 509-963-2171, email: CDSrecept@cwu.edu.**

The CDS Coordinator of Communication Access Services (Ellensburg campus and Eastside centers) or the Coordinator of CDS Westside Operations (Westside centers) will make every effort to respond within 24 hours to identified concerns, such as but not limited to service delays or interruptions, equipment failures, and ineffective accommodations. The CDS

Coordinator will work with the student and service providers as appropriate either to address the student's problem or to identify an equally effective alternative.

Students who feel their concerns have not been adequately addressed may bring their concerns to the attention of the CDS Director at **509-963-2171** or may contact the Associate Vice President for Student Affairs at **Bouillon Hall 204C (509-963-7432)**. Students who believe they have been discriminated or retaliated against with respect to the provision of reasonable accommodations may also access the CWU discrimination complaint procedures by contacting the Director of the CWU Office for Equal Opportunity: **Barge Hall 211, Phone 509-963-2205, email: oeo@cwu.edu.**

Signed: \_\_\_\_\_ Date: 1-6-10  
Charlotte Tullos, Vice President, Student Affairs and Enrollment Management  
(signed original on file)