



Guide to the American Sign Language (ASL) - English Interpreter Service

January 2025

The American Sign Language (ASL) - English Interpreter Service is for individuals in an ODP waiver who utilize ASL. Interpreting is the process of conveying English in grammatically correct American Sign Language and the process of conveying American Sign Language in English.

Starting January 1, 2025, this service is available to individuals in the:

- Consolidated,
- Person/Family Directed Support (P/FDS),
- Community Living, and
- Adult Autism Waiver.

This service is excluded from the waiver limits for P/FDS and Community Living waivers.

The ASL - English interpreter service is a vendor service. Interpreters or interpreter referral agencies can enroll to be a provider of this service. The service can also be reimbursed through an Organized Health Care Delivery System (OHCDs) or through the Financial Management Service (FMS) for individuals who self-direct any of their services. Multiple bids are not required for this service.

Use with Other Services

Individuals may use the ASL – English interpreter service at the same time as other services except the Communication Specialist service. The service also cannot be rendered at the same time as enhanced communication services (U1 modifier) are billed.



For use of the ASL – English interpreter service at the same time as competitive integrated employment, the employer must have applied for a reasonable accommodation under the Americans with Disabilities Act (ADA) and an undue hardship was determined. The Supports Coordinator is to document this in a service note and the outcome section of the ISP. If an undue hardship was not determined, then the employer is responsible to provide an interpreter per the ADA.

With residential habilitation, the ASL – English interpreter service may only be used during:

- Incident investigations, law enforcement activity, or other crisis events,
- Victim’s assistance,
- Completion of the Health Risk Screening Tool,
- Annual service assessments required in Residential Habilitation, such as but not limited to rights training, fire safety, etc.,
- Annual service trainings required by 55 Pa. Code Ch 6100,
- Important team meetings, and
- Other situations as determined to be needed by the team.

This service may not be used during personal care when privacy would generally be expected (while a participant is in a state of undress, during sexual activities, etc.).

Service Rate and Codes

This service does not have a set rate.


The Supports Coordinator is responsible to enter the appropriate codes and number of units necessary into the plan. The unit of service is 15-minutes. Service invoice by the interpreter or interpreting agency can be by date of service or multiple dates of service.

	Procedure Code	Modifier	Modifier
1 interpreter, in person	T1013		
2 interpreters, in person	T1013	U3	
1 interpreter, virtual	T1013		GT
2 interpreters, virtual	T1013	U3	GT



In Person Interpretation, Video Remote Interpretation, and Video Relay Services

The ASL – English interpreter service is available either in person or through video. To clarify the differences between in person interpretation, video remote interpretation, and video relay services, see the below chart.

In Person	An interpreter comes to where the individual is physically located and provides interpretation services.
Video Remote Interpretation (VRI)	<p>An interpreter is on video. The interpretation service is conducted over a video conferencing platform.</p> <p>Note: The video conferencing platform used must be HIPAA compliant.</p>
Video Relay Services (VRS)	<p>Is not included in this service.</p> <p>This is a free service available 24 hours a day, 7 days a week. It is regulated by the Federal Communications Commission (FCC). The FCC prohibits the use of VRS for providing free interpreting services when the two parties seeking communication are in the same room.</p> <p>VRS allows deaf or hard of hearing individuals to communicate through the telephone system with hearing persons. Using a device with a video camera and a broadband (high-speed) internet connection, they contact VRS, who is a qualified interpreter. They communicate with each other in sign language through a video link. They then place a telephone call to the party they wish to call. The VRS relays the conversation back and forth between the parties — in sign language and by voice. No typing or text is involved. This also works vice versa, when a person calls a deaf or hard of hearing person who uses ASL, they are connected audibly to an interpreter through a VRS provider.</p> <div style="text-align: center;">  <p>DEAF CALLER SIGN LANGUAGE INTERPRETER HEARING CALLER</p> </div>



Implementation and Fade Plan

To use the American Sign Language (ASL) - English Interpreter waiver service, the individual and their Individual Support Plan (ISP) team, including the Supports Coordinator, must develop both an implementation plan and a fade plan. These plans are required. The team is responsible for developing the plans however it would be beneficial for the team to identify who is the lead and responsible for keeping it updated. They are to promote direct communication with the individual and their staff and/or paid supports. The ISP team (which includes the Supports Coordinator) is required to have a copy of these plans on file when the individual is authorized to receive this service. The entire implementation plan and fade plan, due to the possible size, does not need to be in the ISP; however, key details should be incorporated into relevant sections of the ISP.

In order to develop an implementation plan and face plan, it is important to understand the basics of “direct communication” versus “interpreted communication.” The chart below explains the differences in these two roles.

ASL Fluent Staff*	ASL Interpreter
A staff person hired to provide a waiver service that <u>communicates directly</u> in American Sign Language For example, a direct support professional (DSP) providing Residential Habilitation services in sign language.	A hired professional to effectively <u>facilitate communication</u> exclusively between parties using ASL and another language, usually spoken English
Fluency is about <u>conversational skills</u> using everyday vocabulary	Required certification with <u>professional skills</u> using broad, technical, and often specific vocabulary
Not required to be certified or registered – fluency should match individual being supported	Level of interpreting skill is tested through professional certification exams like those offered by the Center for Assessment of Sign Language Interpretation (CASLI)
Can offer assistance to another signing person with informal daily interactions like ordering food or checking out at a store	PA law requires ASL interpreters to be registered with the Office for the Deaf and Hard of Hearing (ODHH)
Fluent conversation requires knowledge of shared vocabulary and willingness to interact through conversation with another person	Certification requires knowledge of <u>professional ethics</u> and offers a means for individuals to file a grievance against an interpreter



Fluency levels can range from survival ('where's the bathroom?') to intermediate ('let's talk about our day') to advanced (in-depth knowledge of specialized vocabulary)	Advanced fluency is a minimum requirement to interpret
Can be hearing or Deaf staff	Can be hearing or Deaf interpreters

*For d/Deaf individuals who have ASL fluent staff, they may be eligible for the enhanced communication rate for services from providers in the Consolidated, P/FDS, and Community Living waivers. See the [Guide to ODPs Deaf, Hard of Hearing, DeafBlind Services](#) for more information.

Implementation Plan

An implementation plan should define when and how an individual intends to use interpreters.

The implementation plan should help the team to estimate the amount of time/service needed to be authorized on the plan. The team should consider the different types of service codes, a mix of 1 person, 2 person, virtual, and in person codes until it is determined what combination of codes meet the need.

Note: Interpreters may bill up to 30 minutes of preparation time per participant per day billed.

The plan should also include how interpreters will be scheduled, cancelled (when not needed), what each team member is responsible for, and when.

The following are some considerations for the plan:

- Determine the individual's sign language fluency
 - Many individuals with intellectual disabilities and autism use sign language at varying levels of fluency. Understanding the individual's unique language needs before establishing a plan is important. Contact the Deaf Services Coordinator if guidance is needed.
- Determine any training needs on how to use an interpreter
- Ensure communication access for the following events or situations:
 - Incident investigations, law enforcement activity, or another crisis event
 - Victim's assistance
 - Assessments
 - Individual Support Plan meetings and other important meetings
 - Any direct waiver supports/services not provided in ASL, including Supports Coordination
 - Medical appointments, religious events, educational settings, etc.
 - Note: The Americans with Disabilities Act covers external entities like medical professionals, religious events, educational settings, etc. When



an individual uses these services, the interpreter should be provided by that entity. If there is a question about who is expected to provide the interpreter, contact the Deaf Services Coordinator.

- Define criteria for other situations as determined to be needed by the team. These may include:
 - Discussions about new or changing supports and services
 - Virtual meetings and phone calls, family meetings, etc.
 - Many planned events; a birthday party, family visiting, or a holiday event
 - Some everyday uses may apply such as when there are no signing staff available or staff are learning sign language but are not yet fluent enough for effective communication
- Determine the benefits versus the risks.
 - Is the communication occurring essential to health and safety? If there is high risk if the communication is not clear, an interpreter should be utilized.
 - Is direct communication valued above fluency? If the social connection is more important than the content of what is being said, direct communication may be better. For example, being able to directly connect with a co-worker socially may be better done without an interpreter, but instructions on how a job must be completed may be better done with an interpreter.
- Define how and when Video Relay Service (VRS) will be used.
 - Note: This requires that the individual has a video phone or app and that they know how to use it effectively. For more information on how to get a video phone for free and/or how to use VRS, please visit the [FCC Website](#) and [Sorenson](#) and/or contact the Deaf Services Coordinator.
- Include strategies for how the team will monitor the plan's effectiveness and adjust as necessary.

Fade Plan

A fade plan should define how the interpreter service will be faded; how the team will increase direct communication and reduce interpreted communication.

Consider the following:

- The teams' policies:
 - What are the policies for hiring/recruiting sign-fluent staff?
 - What are the policies for increasing sign fluency of current staff?
 - What are the policies for maintaining signing skills and providing on-going training and signing events for staff to practice their skills?
- Additional supports that will be used to support direct communication, such as



- visual schedules,
- devices/technology,
- object references (a physical object that is used to refer to a person, place, or activity),
- touch cues, etc.
- There will likely always be times when an interpreter is needed. Define what settings/events interpreters will continue to be needed, regardless of the level of sign language fluency of staff. These may include, for example, assessments, victims' assistance discussion, etc.
- For services with multiple staff, define how staffing will be handled to ensure that effective communication is occurring most of the time. For example, staff who are less fluent could work night shifts when communication needs may be lower, more-fluent staff could be paired with less-fluent staff to mentor new learners, etc.
- Define how the team will know that direct communication has become effective and in which settings/events and the use of an interpreter can be reduced. Consider and address the following questions in the fade plan:
 - How will the individual's sign language fluency be determined/monitored?
 - Many individuals use sign language at varying levels of fluency. With improved access to signed communication, an individual's fluency may change or improve. It is important to understand everyone's unique language needs when considering a fade plan. Contact the Deaf Services Coordinator if guidance is needed.
 - How will staff fluency levels be assessed?
 - Options can include but are not limited to publicly available sign language assessments like the Sign Language Proficiency Interview (SLPI) or applying for the Enhanced Communication Rate through the ODP, Special Populations Unit
 - Are there data indicators such as a decreased number or intensity of incidents or a reduced need for behavior or communication supports?
- Define when the individual may need to start increasing use of interpreting services again. Consider:
 - When there is turnover of signing staff
 - When the individual's language needs change
 - When there is a change in the individual's mental or physical health
- Include strategies for how the team will monitor the plan's effectiveness and adjust as necessary.

The implementation and fade plans are not required to go to ODP or the Deaf Services Coordinator for review, however teams are welcome to contact the Deaf Services Coordinator for technical assistance, guidance, or review if desired.



Finding Certified Registered Interpreters

This waiver service requires compliance with the Sign Language Interpreter and Transliterators State Registration Act of 2004, which requires registration with Pennsylvania's Office for the Deaf and Hard of Hearing.

The Office for the Deaf and Hard of Hearing (ODHH) website includes a database with all sign language interpreters who meet the Pennsylvania registration requirements. The database can be found on the [ODHH website](#).

Interpreter referral agencies may be used, as long as they use an interpreter that fully complies with requirements.

How to Use an Interpreter

First is it important to ensure the individual and team understand the interpreter's role. The interpreter is there to help facilitate communication, to help the individual understand what is being said and allow them to fully participate.

When scheduling with an interpreter or an interpreter referral agency, it is standard business practice for interpreters to want an agreement signed. SCO, providers, and individuals may have agreements with several interpreters or agencies, this is standard practice. The agreement will usually include the scope of service, invoicing, etc. It is important to review and understand what is being signed. Typically, interpreter agencies will require a no-show or cancellation payment in the agreement; this is not allowable for waiver services. The waivers cannot pay for services that are not rendered. If there is already a contract/agreement, it should be revisited to ensure the language is allowable.

Ensure that the interpreter or interpreter referral agency is aware that waiver funds will be used to pay for the service.

Give the interpreter or agency essential information like:

- The interpreter will need to know where the service will be held.
- They will need to know what time to schedule and will need a start and end time.
- They will want to know who they are interpreting for; it would be good to share some information about the individual's communication when possible. Interpreters follow a strict code of ethics and are required to maintain confidentiality.



- Lastly, they will need information on what they will be interpreting. This could be a meeting, a party, etc. Any information the team can give them about what they will be interpreting will be helpful to them.

More information on using interpreters can be found on MyODP under [Deaf, Hard of Hearing, DeafBlind](#).

Contact

Any questions or concerns can be directed to the Deaf Services Coordinator at RA-ODPDeafServices@pa.gov.