



1 before service and fees paid for no-show appointments. Non-contracted providers are not paid  
2 no-show fees. The need for non-contracted providers can be due to rural locations where  
3 providers have limited staff to provide services and the provider may not have the available  
4 resources to obtain required credentials such as the UNTWISE Director. VR must provide  
5 interpreters to individuals who are deaf or hard of hearing and use languages such as American  
6 Sign Language (ASL); therefore, the occasional need to use non-contracted providers exists.

## 7 **Issue**

8 The Rehabilitation Services Administration (RSA) has clarified that no-show fees are an  
9 “improper payment” per 2 CFR §200.53(b) and not an allowable use of VR funds. An improper  
10 payment is “any payment for a good or service not received.” One option suggested to states is  
11 to consider an increase in fees to offset the business impact to communication access agencies.

12 VR field staff reports difficulty in retaining or being able to contract with communication access  
13 service providers. Further exacerbating this situation by eliminating no-show and cancellation  
14 fees will contribute to a decline in available providers of communication access services. TWC  
15 VR has received communication from several interpreting businesses that they will not continue  
16 to do business with the agency if cancellation fees and no-shows are not paid. Businesses will  
17 still be required to pay their staff for these fees as it is a standard business practice with the  
18 communication access industry. This will negatively affect VR services and likely impact  
19 successful employment outcomes for customers who are deaf or hard of hearing.

20 VR reviewed information about rates paid by other VR state agencies as well as information  
21 from the U.S. Department of Labor’s (DOL) Consumer Price Index (CPI) and the U.S. DOL’s  
22 Bureau of Labor Statistics. The proposed rates are first adjusted for inflation based on the CPI.  
23 In addition, to mitigate the additional business cost to providers of VR no longer paying an  
24 industry standard fee for late cancellations and no-shows, VR proposes a 30 percent increase in  
25 the hourly rates. This increase is based on the understanding that the primary expense for  
26 providers is the salaries and wages for the interpreters and CART personnel, which must be paid  
27 by the provider even when there is a late cancellation or no-show.

28 With a minimum of one hour, the following rates are proposed for contracted providers:

- 29 • Daytime (8 a.m. to 5 p.m. weekdays) rate for interpreter’s first hour
  - 30 ➤ \$130.00/hour for noncertified interpreters
  - 31 ➤ \$162.00/hour for Level A interpreters
  - 32 ➤ \$182.00/hour for Level B interpreters
  - 33 ➤ \$206.00/hour for Level C interpreters
  - 34 ➤ \$246.00/hour for tactile interpreters
  - 35 ➤ \$376.00/hour for CART On-Site: 1 provider
  - 36 ➤ \$508.00/hour for CART On-Site: 2 providers
  - 37 ➤ \$290.00/hour for Remote CART

- 1 • Daytime (8 a.m. to 5 p.m. weekdays) rate for interpreter’s additional hours
- 2     ➤ \$65.00/hour for noncertified interpreters
- 3     ➤ \$81.00/hour for Level A interpreters
- 4     ➤ \$91.00/hour for Level B interpreters
- 5     ➤ \$103.00/hour for Level C interpreters
- 6     ➤ \$123.00/hour for tactile interpreters
- 7     ➤ \$188.00/hour for CART On-Site: 1 provider
- 8     ➤ \$254.00/hour for CART On-Site: 2 providers
- 9     ➤ \$145.00/hour for Remote CART

10 Additional rates are proposed for last-minute, evening, weekend, holiday, trilingual, and court,  
11 based on level of certification. See non-contracted rates for all interpreter services in Addendum  
12 B.

13 DOI calculated the fiscal impact of the proposed rate increases by determining the actual  
14 expenditures for Interpreter and CART services and comparing the expenditures for these  
15 services for Program Budget Years 2015-2019. The fiscal impact of the proposed rate changes  
16 would be an estimated increase in annual expenditures of \$125,521.

17 To address the expenses associated with provider travel to deliver services in rural or remote  
18 locations, staff also proposes including communication access providers under Vocational  
19 Rehabilitation Standards for Providers (VR-SFP) 20.10 Travel Premium. The travel premium  
20 allows contracted providers to be reimbursed for mileage and other travel-related costs. The  
21 mileage reimbursement is based on direct travel for each mile more than 50 miles traveled within  
22 a round trip.

23 To provide clear guidance to staff and providers about the proposed changes to Communication  
24 Access services and rates, staff prepared revisions to the Vocational Rehabilitation Services  
25 Manual (VRSM) C-305: Interpreter Services, VRSM D-204-5 No Show Payments and VR-SFP  
26 20.10 Travel Premium. Staff also prepared new VRSM sub-chapter C-310: Communication  
27 Access Realtime Translation and VR-SFP Chapter 24: Communication Access Services. These  
28 revisions to the VRSM and VR-SFP will be implemented upon final adoption of revised rates by  
29 the Commission.

30  
31 **Decision Points**

32 Staff seeks direction on Commission approval to notify Communication Access providers of the  
33 following proposed rates, and to invite their questions and comments on:

- 34 • establishing new rates for interpreting and CART services;
- 35 • including communication access providers under VR-SFP 20.10 Travel Premium; and
- 36 • revising VRSM C-305: Interpreter Services, VRSM D-204-5 No Show Payments and  
37 VR-SFP 20.10 Travel Premium and creating the new VRSM sub-chapter C-310:

1           Communication Access Realtime Translation and VR-SFP Chapter 24: Communication  
2           Access Services with the Commission’s adoption of the proposed rates.

3    If approved, staff will review feedback received on the proposed rates and bring final VRSM and  
4    VR-SFP chapters, including rates, to the Commission for consideration and adoption in February  
5    2020.

6    **Rehabilitation Council of Texas**

7    The Rehabilitation Council of Texas reviewed the proposed rate revisions on September 17,  
8    2019 and agreed with the changes.