To: Washington State Student Services Commission

From: Washington State Disability Services Professionals

Date: May 5, 2023

Subject: HB 2669 Leaving Us Legally Vulnerable

We’re writing as a collective group of disability support services professionals managing sign language interpreting services for D/deaf and hard of hearing Washington state college students. We’re facing two impactful challenges that need your attention and creative solutions. As it stands, we are at significant risk of non-compliance with Section 504 and the Americans with Disabilities Act (ADA).

Our colleges work with a mix of contractors, agencies, and full-time and part-time staff interpreters. Even with this many options at our disposal, we are increasingly struggling to meet accessibility compliance for sign language interpreter accommodation requests. A nationwide shortage that is particularly impacting colleges and universities is largely to blame. We will not be able to combat this shortage without tackling issues that require budget increases. The number one concern is hourly pay.

The Office of Financial Management is aware that the full-time classified staff, or Deaf interpreter 3, rate is significantly below area comps and our understanding is that they are willing to work on this class in two years. In the meantime, we have only 4 DI3 positions left in the state for colleges and two of those are currently vacant due to low compensation.

This is increasingly concerning as HB 2669 becomes effective July 1, 2023. We have very few DI3s so most of us rely heavily on our part time hourly interpreters to do the bulk of our interpreting accessibility work. Historically their rate of pay as a part-time interpreter has not had to be commensurate with the equivalent hourly rate of the DI3. We could therefore pay closer to the community rate and stay more competitive in attracting interpreters to work with us. It has worked relatively well for us and our students; given the many benefits of consistent interpreters in the classroom.

With HB 2669 coming into effect in the next couple of months, those part time hourly interpreters will separate from the college due to low pay. Losing these employees will force Washington colleges into using agencies and paying a much higher cost (at least three times as much as an hourly DI3.)

We cannot attract full-time interpreters now with the salary matrix in place and we will not be able to move part-time interpreters into this job class either. We are all being given different guidance by our HR departments and would appreciate a clearer idea of what this means for our 1050 employees who are needed for compliance but will have no appropriate position, with appropriate compensation, to move into on July 1st. We do not want to be forced into a position of only hiring through agencies. Our colleges would be paying more for a poorer service being provided to our students.

To continue providing this vital access to our students, we will need to continue to have access to full-time interpreter employees (where the student population demands such), contracted interpreters working on a part-time basis, and agency support. We ask that you advocate on our behalf with OFM to make this position review an urgent review priority. We understand that some schools are being allowed to hire former part time employee interpreters as direct contractors/vendors where others are not. This needs to be an option systemwide.

In March 2023, our group conducted a survey with 26 colleges responding and all shared these concerns. If OFM cannot be encouraged to review right away and if it’s not possible to have universal guidance, would the College Presidents and Vice-Presidents work with HR departments to support hiring interpreters as independent contractors, with little or no break-in-service?

This letter is also being sent to the Washington State Council of Presidents and Office of Financial Management (OFM).

Sincerely,

*Disability Services professionals from:*

Clark College

Bellingham Technical College

Columbia Basin College

Everett Community College

Highline College

Olympic College

Spokane Community College

Spokane Falls Community College

Skagit Valley College

Washington State University-Vancouver

Wenatchee Valley College

Whatcom Community College

Yakima Valley Community College