

## **ADA Policy for the ETOE™ Examination Candidates: Reasonable Accommodation for Individuals Who are Blind**

### **Overview**

This policy has been developed based on the Americans with Disabilities Act (ADA) of 1990, Title III and its Final Rule amending 28 CFR Part 36: Nondiscrimination on the Basis of Disability by Public Accommodations and in Commercial Facilities.

Whenever possible, CCHI is committed to providing reasonable accommodation in its examination processes to individuals with disabilities, in accordance with the Americans with Disabilities Act (ADA).

Appropriate accommodations will be provided to qualified individuals with disabilities to the extent that such accommodation does not fundamentally alter the examination or cause an undue burden to CCHI or the agency administering the examination.

It is the responsibility of individuals with disabilities to notify CCHI in writing no later than 45 days before scheduling an exam, of the candidate's need for an accommodation and provide all supporting documentation in electronic format.

There are two ways to notify CCHI of the ADA accommodation request:

- If a special need or disability is present at the time of paying for a CCHI examination and before receiving a *Notice to Schedule*, the applicant should choose the "Request Accommodations" option before they select the orange "Pay Fees" button in the online application system. At this time the applicant will be directed to explain the nature of their request and to upload necessary documentation in an electronic format.
- If a special need or disability occurs after the candidate has already received their *Notice to Schedule*, they must complete and submit via email to [apply@CCHICertification.org](mailto:apply@CCHICertification.org) CCHI's [ADA Accommodation Request Form](#) (this form is in *Appendix C* of CCHI's *Candidate's Examination Handbook* and on the website at <http://cchicertification.org/about-us/policies/>).

Candidates must state the type of accommodation(s) needed, in addition to providing current and appropriate documentation of the disability. The

candidate's request will not be considered complete and reviewed without the *ADA Accommodation Request Form*. This form and accompanying documentation may be submitted to: [apply@CCHIcertification.org](mailto:apply@CCHIcertification.org).

The documentation provided in CCHI's *ADA Accommodation Request Form* must not be more than three years from the date of the application. It should include correspondence from a healthcare provider who has first-hand knowledge of the disability, describing the nature of the disability and including the American ICD10 codes which make a candidate eligible for the accommodation. The letter should be on the letterhead stationery of the healthcare provider in question, and include his or her title, address, phone number, and original signature. The candidate grants CCHI permission to contact the professionals who submitted documentation in support of a request for accommodation in order to obtain further clarification concerning a request.

Candidates shall not hold CCHI accountable for any lack of appropriate accommodation deriving from the applicant's own failure to notify CCHI of their needs on a timely basis. Once special accommodations have been granted, they may not be altered during the examination.

## **Who is Eligible for Accommodations as an Individual Who Is Blind**

For the purposes of this policy, CCHI distinguishes between individuals who are blind and those who have low vision. For accommodations provided to candidates who have low vision, see the "ADA Policy for the CHI™ and ETOE™ Examination Candidates: Reasonable Accommodation for Individuals Who Have Low Vision." CCHI uses the current American ICD10 medical billing codes in effect at the time of the candidate's request, available at <https://www.icd10data.com> to determine the candidate's eligibility.

**Individuals who are blind** must present documentation:

- specifying their diagnosis that confirms their bilateral blindness whose correction (eye glasses or lenses) still prevents them from reading a computer screen with a non-enlarged font of 14 points, and
- containing the ICD10 codes: H54.0, H54.1, H54.8, and, in some cases, H54.3 (available at <https://www.icd10data.com/ICD10CM/Codes/H00-H59/H53-H54/H54->).

## **Accommodations for Individuals Who are Blind**

The objective of this policy is to provide guidance on the reasonable accommodation to individuals who are blind and who are unable to read a computer screen (hereinafter "candidate who is blind"). At present, CCHI is offering a human reader (and a note taker if requested), extended time, and omission of the last unscored question ("Speaking Skills in the Language

Other Than English™) as a reasonable accommodation to these individuals who otherwise meet the eligibility requirements to take the English-To-English™ (ETOE™) Interpreting performance examination.

CCHI has sole discretion to determine whether a candidate meets the requirements to receive an accommodation. A candidate must submit CCHI's ADA Accommodation Request Form with all required accompanying documentation. CCHI will review all requests and determine whether to grant an accommodation. A candidate who does not file an accommodation request will not be granted an accommodation. If the candidate schedules an examination date and requests an accommodation at the testing center, the candidate will forfeit the examination fee and have to submit a request for accommodations application with a new examination fee prior to being evaluated for an accommodation.

## **Accommodation Provided:**

### **1. Human reader**

A human reader is an individual who can read, write, speak and understand English with the proficiency and command of the English language at the level of a native English speaker from the United States or is a native United States English speaker.

CCHI offers services of a human reader as reasonable accommodation for candidates who are blind. The function of the human reader is to read aloud the information displayed on the computer screen while a candidate who is blind is taking the ETOE™ oral performance examination, including the text sections of the examination.

Human readers must sign CCHI's Security and Conflict of Interest Agreements prior to performing the duties of a human reader. If a CCHI-appointed human reader is also a rater of the ETOE™ exam, such individual may not score the candidate's responses. CCHI-appointed human readers may be compensated for this task.

**A candidate CANNOT bring their own human reader.** CCHI has sole discretion to nominate an individual as a human reader.

### **2. Note taker**

A note taker is an individual who can read, write, speak and understand English with the proficiency at the level of a native speaker and is a native speaker of English.

CCHI offers services of a note taker as reasonable accommodation for candidates who are blind. The function of the note taker is to write down and read back the candidate's notes while a candidate who is blind is taking the

ETOE™ oral performance examination.

The candidate is responsible for telling the note taker what to write down while the candidate is listening to the recorded prompts. The candidate is responsible for instructing the note taker, with an agreed-upon verbal signal or gesture, on when to read the notes back. All notes are left in the examination room and destroyed by the proctor at the time the exam ends.

**The note taker may be the same person as the human reader.**

### **3. Time Extension**

The time allotted to complete the ETOE™ examination without reasonable accommodation is one hour, exclusive of initial instructions. CCHI has determined that **an increase of 40% over the total exam time**, exclusive of initial instructions, provides a reasonable accommodation for individuals who are blind to take the ETOE™ examination. Therefore, the total actual examination time for a reader-assisted examination has been increased from 60 minutes (one hour) to **84 minutes** (one hour and 24 minutes). Keep in mind that this time extension is provided for navigating the exam and reading the texts of the *Equivalence of Meaning* and *Reading Comprehension* sections. No extra time is added to the recording of the responses.

### **4. Omission of the last item "Speaking Skills in the Language Other Than English," which is unscored**

The examination consists of 22 items which require audio recording of candidate's responses in English and 1 (one) unscored item, the last one on the exam, that requires a candidate to describe a picture in their Language Other Than English. Candidate who is blind does NOT record their response to the last item which asks them to describe a picture in the Language Other Than English, i.e., their accommodated exam consists of 22 items.

### **Role of the Proctor**

A proctor is the individual administering the examination at the designated test center. A proctor CANNOT also serve as the human reader for the same examination administration. However, a test center's proctor may serve as a human reader if a second proctor is available to proctor the examination. One individual cannot perform two roles for the same examination administration.

### **Introductory Process**

Prior to the proctor logging the candidate in to begin the examination process, the human reader and note taker will introduce him/herself to the

candidate who is blind and read the corresponding Introductory Statements (Appendices A & B). The human reader will explain the role of the human reader and inform the candidate that the candidate may, at any time during the examination administration, ask the reader to speed up or slow down, to read louder or softer.

If the human reader also performs the functions of the note taker they will also explain those functions. If the note taker is a different person, they explain their functions and practice them after the human reader.

The human reader will read aloud all instructions. Questions that the candidate may have about the instructions must be directed to the attending proctor, as is the current policy for all candidates.

Questions will be read to the candidate in the order they normally appear on the test.

The note taker will write down the comments/notes of the candidate when the candidate says so. The candidate makes an agreement with the note taker about how the notes are read back during the candidate's recording of their responses. The candidate may use a verbal signal or a gesture to prompt the note taker to read the notes back. The note taking process is practiced during reading the *Directions* to the exam.

No candidates, either with or without a human reader/note taker, are allowed breaks outside the testing room during the examination.

**Candidates may not bring any materials into the examination room or utilize any screen-reading or note-taking devices during the examination process.**

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## **ETOE™ Examination Process**

### **a. Time Allotment for a Reader-Assisted Examination**

The time allotted to complete the ETOE™ examination without reasonable accommodation is one (1) hour, exclusive of initial instructions. CCHI has determined that an increase of 40% over the total exam time, exclusive of initial instructions, provides a reasonable accommodation for individuals who are blind to take the ETOE™ examination. Therefore, the total actual examination time for a reader-assisted examination has been increased from 60 minutes (one hour) to 84 minutes (one hour and 24 minutes). This time extension is provided for navigating the exam and reading the texts of the *Equivalence of Meaning* and *Reading Comprehension* sections. No extra time is added to the recording of the responses.

## **b. Number of questions on the ETOE™ examination**

The examination consists of 22 items which require audio recording of candidate's responses in English and 1 unscored item, the last one on the exam, that requires a candidate to describe a picture in their Language Other Than English. All candidates, including individuals who are blind, must pass the ETOE™ exam to earn the CoreCHI-Performance™ certification, i.e., provide audio responses to 22 scored items. The sole difference for a candidate who is blind is that they do NOT answer the unscored question.

## **c. Process**

A candidate who is blind is responsible for managing the time allotted to take the examination, and must complete the examination within the allotted one hour and 24 minutes. No additional time will be provided. Reading the instructions before each exam section (these are not initial instructions) counts towards the total examination time. If the candidate who is blind does not finish within the allotted time, the examination will automatically be closed and submitted for scoring.

The human reader cannot resolve, explain, or provide assistance other than the task of reading aloud the materials on display, such as instructions and the sight translation section, and press the appropriate "play", "record", "next" buttons. The human reader can also answer questions by the candidate who is blind only in the following circumstances:

- to repeat instructions;
- to play items in the **Listening Comprehension** and **Restate the Meaning** sections a second time;
- to read texts of the **Equivalence of Meaning** and **Reading Comprehension** sections a third or a fourth time;
- to stop a recording of an answer if time has not elapsed;
- to verify the remaining time and examination progress displayed on the screen.

The note taker cannot resolve, explain, or provide assistance other than the task of writing down and reading back the candidate's notes. The note taker writes down only the words spoken by the candidate. The candidate is responsible for telling the note taker what to write down and for instructing, with an agreed-upon verbal signal or gesture, when to read the notes back.

### Instructions before each exam section

Reading of the instructions before each exam section (these are not initial instructions) **counts towards the total examination time**. The human reader will read the instructions displayed on the screen. ONLY upon request by the candidate will the human reader read the instructions a second time. When prepared to proceed, the candidate says, "Ready."

### Listening Comprehension section

There is 1 (one) item in this section. The human reader will press "play" to play a recorded item which is between 150-170 words long. After the item is played, the candidate may ask to play it a second time. The reader may then play the item a second time. When prepared to record their response, the candidate says, "Ready", and the human reader presses the "record" button, and the candidate starts recording their response.

### Shadowing section

There is 1 (one) item in this section. When the candidate says, "Ready," the human reader presses the "play/record" button for the Shadowing item. The candidate starts repeating in English what they hear at the same time as listening to the item.

### Memory Capacity section

There are 8 items in this section; each item is up to 35 words long. Each item can be played only one time. The human reader will press "play" to play a recorded item. When prepared to record their response, the candidate says, "Ready", and the human reader presses the "record" button, and the candidate starts recording their response.

### Restate the Meaning section

There are 7 items in this section; each item is up to 35 words long. Each item can be played two times. The human reader will press "play" to play a recorded item. After the item is played, the candidate may ask to play it a second time. The reader may then play the item a second time. When prepared to record their response, the candidate says, "Ready", and the human reader presses the "record" button, and the candidate starts recording their response.

### Equivalence of Meaning section

There are 4 text-based items in this section; each item is between 30-40 words long, with 5 underlined medical terms. The human reader sits to the side of the candidate away from the microphone on the candidate's headset. The human reader needs to sit at a distance comfortable for the candidate to hear the reading yet relatively far from the microphone so that the reader's voice interferes as little as possible with the candidate's recording.

The human reader reads the text of an item, saying the word "underlined" before reading the underlined term. Then the human reader says, "Again, the 5 underlined terms are" and reads just these terms. Then the reader reads the item again, pausing at the end of each sentence. The candidate may ask for the item to be read two more times. Only upon such a request from the candidate, the human reader may read the item a third and/or a fourth time. When prepared to record their response, the candidate says, "Ready", and the human reader presses the "record" button, and starts reading the item, at a normal speed, and the candidate starts recording their response. In other words, the candidate records their response at the same

time as the reader continues to read.

#### Reading Comprehension section

There is 1 (one) item in this section which consists of a text and 3 questions. The text is between 170-220 words long. The answers to all 3 questions need to be recorded at once, one after the other, without pausing/stopping the recording.

The human reader reads the text of the item. Then the human reader reads the three questions. Then the reader reads the text again, pausing at the end of each sentence (and if necessary – the 3 questions). The candidate may ask for the text to be read two more times. Only upon such a request from the candidate, the human reader may read the text a third and/or a fourth time. When prepared to record their responses to the three questions, the candidate says, “Ready”, and the human reader presses the “record” button.

The human reader does NOT read the last item “Speaking Skills in the Language Other Than English” because the accommodated candidate does not need to answer it.

**To finish the exam and submit it**, the reader clicks on the “Finish Section” button in the top right corner of the screen. Clicking on this button completes the whole exam and moves the candidate to the section of the “Candidate Satisfaction Survey” which they may respond to or skip, and just submit the exam.

#### **FEES**

CCHI does not charge candidates for the costs associated with providing a human reader and note taker or additional time for examination administration.



## Appendix A

### The Human Reader Introductory Statement

My function as the human reader is to read aloud the information displayed on the computer screen, such as instructions, and the texts of the *Equivalence of Meaning* and *Reading Comprehension* sections of the examination.

If you have any questions or concerns about the instructions or the examination administration, please direct them to the attending proctor and not to me.

You can direct the following requests to me at any time:

- to speed up or slow down my reading, or to read louder/softer;
- to repeat instructions (keep in mind that as soon as the test starts the time of repeating the instructions will count towards your test time);
- to play items in the **Listening Comprehension** and **Restate the Meaning** sections a second time;
- to read texts of the **Equivalence of Meaning** and **Reading Comprehension** sections a third or a fourth time;
- to stop a recording of an answer if time has not elapsed;
- to verify the remaining time and examination progress displayed on the screen.

I will first read the instructions of the equipment check, and you will perform the check of your mike and headphones. Once you tell me that the sound volume and recording work, I will start the exam and read the *Directions*. There is no limit on how many times you may ask me to repeat them, and the Directions time, up to 15 minutes, is not counted towards your total examination time.

I will read the test items in the order they appear on the examination.

If you need me to play any items in the **Listening Comprehension** or **Restate the Meaning** sections a second time, you **MUST** ask me to do so. Each item in these sections can be played only two times.

The items in the **Shadowing** and **Memory Capacity** sections of the exam can only be played once. For the **Shadowing** item, as soon as I press the play button, the recording will start and you must repeat what you hear in English simultaneously. The recording of your responses to the **Memory Capacity** items is done consecutively.

During the **Equivalence of Meaning** and **Reading Comprehension sections** of the exam, I will read the texts twice: first in its entirety and then, with pauses, by sentences. If you need me to read the texts a third or fourth time, you **MUST** ask me to do so. Each of these items can be read only four times in total.

**I will not read the final unscored item that asks you to describe a picture in the Language Other Than English** because you are exempt from answering it.

**You** are responsible for managing the time allotted to take the examination, and must complete the examination within the time allotted to you by CCHI as part of the accommodation. No additional time will be provided.

Candidates, either with or without a human reader, **are NOT allowed breaks** during the examination.

## **Appendix B**

### **The Note Taker Introductory Statement**

My function as the note taker is to write down your comments/notes while you are listening to the exam prompts and read them back to you when you are ready to record your responses.

I will only write down the words you are saying.

You may use a verbal signal or a gesture to tell me to read the notes back to you. Please tell me if you'd like to use a verbal signal, for example, "Read" or show me a gesture that you want to use.

At your signal, I will read the notes.

We will practice the note taking process during reading the *Directions* to the exam.

If you are ready, the human reader [*Instruction to the Note Taker: Use "I" if you perform the human reader's function as well*] can start the instructions part of the examination.