

Incident Resolution Process (IRP)

For Language Access Providers (LAPs)

Effective November 1, 2024

Introduction

The Washington State Department of Labor & Industries (L&I) Interpretation Services program supports medical and vocational providers in meeting their federally required obligation under Title VI of the Civil Rights Act of 1964 to provide language access for limited English proficiency (LEP) workers and crime victims. The Incident Resolution Process (IRP) was established in 2024 to ensure high-quality interpretation services for LEP workers and crime victims when seeking services through L&I. SOS International LLC (SOSi) is the scheduling and interpretation services contractor for L&I, serving as the coordinating entity responsible for implementing the IRP. L&I requires SOSi to manage feedback based on the quality assurance standards and procedures established in this IRP document.

Consistent with the Collective Bargaining Agreement (CBA MOU-1) between L&I and Washington Federation of State Employees (WFSE) for Language Access Providers (LAP), L&I welcomes the Union's feedback to improve the process of comments about services provided by LAPs. This input includes, but is not limited to, how LAPs and the Union are notified of feedback made to SOSi regarding services provided by LAPs. The IRP is not subject to the CBA grievance process.

Feedback Process by L&I's Contracted Coordinating Entity

Feedback can be submitted via SOSi's scheduling platform WordBridge, or by phone or email. Feedback received via the L&I interpretation mailbox is also forwarded to SOSi as appropriate. All feedback will be managed by SOSi's Quality Assurance Program, which is dedicated to soliciting and receiving feedback in order to improve the quality of L&I's Interpretation Services Program. LAPs will be notified of any validated feedback that is received about them within ten business days. Additionally, all feedback is tracked through the WordBridge platform and supporting incident management system. Feedback is available to the specific individual LAP, SOSi, L&I, and if applicable, LAP credentialing organization such as DSHS (as defined below).

Who can give feedback?

LAPs, authorized requestors (as defined below), injured worker or crime victim or their legal representative, or L&I staff.

What can they give feedback on?

Providers and LAP services.

What are some potential outcomes for feedback received?

LAP outreach for education, warnings on record, partial or full suspension, or further action up to and including LAP account deactivation and subcontract termination.

How can they submit feedback?

WordBridge scheduling platform (this is the preferred method for feedback relating to a specific appointment): <u>https://www.wordbridge.io</u>

SOSi email: Feedback@wordbridge.io

Phone: +1 888.224.0126

L&I email: interpretation@Ini.wa.gov

Definitions

Authorized Requestor: Authorized users to the WordBridge scheduling system who schedule interpreter services.

Breach: Is generally an impermissible use or disclosure under the Health Insurance Portability and Accountability Act (HIPAA) privacy rule that compromises the security or privacy of the protected health information of an individual. Use or disclosure of protected health information is presumed to be a breach unless the covered entity or business associate, as applicable, demonstrates that there is a low probability that the Personal Health Information (PHI) has been compromised. Coordinating entity must notify L&I's privacy officer of every potential HIPAA, PHI, or Personal Identifiable Information (PII) violation to determine if a breach occurred.

Business Days: Monday through Friday, 8:00am to 5:00pm Pacific Time, excluding Washington State recognized holidays. All days referenced in this document are to be construed as business days unless otherwise noted.

Code of Conduct: Professional standards for all LAPs who provide language services as outlined in Washington State Administrative Code (WAC) 388-03-050, available through the link provided in the "Resources" section at the end of this IRP and also attached hereto.

Coordinating Entity: SOS International LLC (SOS), its employees, subcontractors, and agents performing services under contract K5140 between L&I and SOSi.

Corrective Action: A set of actions put in place to rectify, improve, or eliminate nonconformities or undesirable behaviors or situations.

Deactivate: LAP does not receive new appointments and will not complete the appointments that were previously assigned to them. These assignments will be reassigned to other available LAPs. LAP may be deactivated during an investigation or due to an incident or recurring incidents as described herein. The LAP will have access to the scheduling system to view invoices during the deactivation period.

Department of Social and Health Services (DSHS): Washington State Department of Social and Health Services (DSHS).

Extenuating Circumstances: Death in the family; serious illness of family or self; incapacitation of self; fire or other form of destruction to immediate household family or self; an unanticipated event or difficulty beyond the LAP's control, including reported inclement weather conditions. LAPs that overuse extenuating circumstances may be required to provide proof of the situation.

Feedback: A compliment or a complaint reported by an LAP, authorized requestor, injured worker or crime victim or their legal representative, or L&I staff.

Formal Written Notice: LAPs who accumulate four Low Severity Incidents or one Medium Severity Incident will receive a Formal Written Notice via email in the form of an Incident Report

outlining the details of each violation. This document will also be forwarded to the L&I Interpretation Services Program Manager.

Harassment: Verbal, non-verbal or physical conduct that threatens, intimidates, coerces, offends, or taunts another person, including sexual, racial or ethnic slurs.

Health and Safety Violation: The violation of an individual's rights to a safe and healthy environment, and the potential security breach of PHI.

Health Insurance Portability and Accountability Act of 1996 (HIPAA): From the Centers for Disease Control: "The Health Insurance Portability and Accountability Act of 1996 (HIPAA) is a federal law that required the creation of national standards to protect sensitive patient health information from being disclosed without the patient's consent or knowledge."

HIPAA compliant environment: Is a secure and quiet location where only the LAP can see or hear the provider and worker or crime victim. It must be free from disruption from other people, children, pets, noises, and not be in a public setting, such as but not limited to:

- Outside the home,
- While driving,
- At a playground or outdoor area, including any public areas, or
- At home while loud disruptions can be heard by the authorized requestor or the worker or crime victim.

Incident: The resulting outcome, pending investigation, of each complaint received regarding an LAP's action that violates the code of professional conduct as outlined in WAC 388-03-050 or any other LAP requirements or expectations as set forth herein. Depending on the severity of the complaint, the LAP may receive a Low, Medium, or High incident rating.

Interpreter Incident Report: A report of the detailed incident or action that resulted in a violation of the code of conduct outlined in WAC 388-03-050 or any other LAP requirements or expectations as set forth herein.

Intimidation: To intentionally say or do something which would cause a person of ordinary sensibilities to be fearful of reputational harm.

Invalid Reason: Such as, but not limited to: public road closure notices where two or more days advance notice was given; forgotten appointment; canceled the wrong appointment; double-booked in-person and remote appointments; vacation; previous appointment ran long; home technology does not meet remote interpreting requirements.

Language Access Provider (LAP): Individual providing in-person (IPI), video (VRI), or overthe-phone (OPI) interpretation services for L&I injured workers or crime victims requested through the WordBridge scheduling system.

Late Cancelation: LAP gives back appointment less than 24 hours before the scheduled start time unless the appointment is returned within 30 minutes of accepting the job.

No Show: LAP did not attend the medical/vocational appointment and did not notify or report to coordinating entity in advance.

Personal Identifiable Information (PII): Any representation of information that permits the identity of an individual to whom the information applies to be reasonably inferred by either direct or indirect means.

Personal Health Information (PHI): The HIPAA privacy rule provides federal protections for personal health information held by covered entities and gives patients an array of rights with respect to that information. At the same time, the privacy rule is balanced so that it permits the disclosure of personal health information needed for patient care and other important purposes.

Retaliation: The act or appearance of seeking revenge upon another.

Restriction Period: Period of time during which an LAP's access to L&I appointments via the WordBridge platform is fully or partially limited in some capacity as a result of corrective action. Restriction periods may range from 7 to 90 calendar days.

Revocation: A process undertaken by the LAP credentialing organization to revoke the credential(s) of an LAP.

Severity Level: The level of an incident as outlined in this IRP related to violations of the code of conduct or other LAP requirements or expectations as set forth.

Suspension: LAP is not offered new appointments during an investigation or during a temporary suspension due to an incident or recurring incidents. The LAP may keep the appointments that they had scheduled but cannot accept new appointments. The LAP will have access to the scheduling system to view invoices during the suspension period.

Termination of Sub-contract: An LAP may be terminated (deactivated) from servicing L&I appointments through L&I's coordinating entity following an investigation and finding of an incident(s) at any severity level, or for HIPAA or PHI violations. All terminations are reviewed and approved by L&I prior to the effective date. Once terminated, an LAP may not subcontract with L&I's coordinating entity.

Valid Reason: Such as, but not limited to: unexpected travel emergencies (i.e. short-notice road closures, traffic accidents, flat tires), illness or medical emergency of self or family; reports obstacles to practice per the WAC 388-03-050; inaccurate or incomplete information given by the requestor; or other extenuating circumstances.

LAP Requirements and Expectations

LAPs are required to adhere to the requirements and expectations established by L&I as set forth below. Failure to comply with these requirements and expectations will result in the standards and procedures that SOSi will follow as described in the "Incident Resolution Process" section below.

Maintaining Credentials

LAPs are responsible for maintaining their credentials as required by the credentialing agency or organization. If the LAP's credentials expire or are revoked for any reason, the LAP must immediately notify coordinating entity.

Failure to maintain or inform coordinating entity of any changes to these credentials or any expiration or termination of these credentials (for any reason) may lead to corrective action depending upon the nature of the credentialing issue and according to the Incident Response Escalation Table. Furthermore, any misrepresentation or fraud related to these credentials or any other required document (such as a background check) will lead to immediate termination.

Compliance with the LAP Code of Professional Conduct

L&I requires LAPs to read, follow, and adhere to the Code of Professional Conduct for LAPs established by the Washington State Department of Social and Health Services (DSHS). The LAP Code of Professional Conduct can be found at <u>Section 388-03-050 of the Washington</u> <u>Administrative Code</u>. Any violation of the LAP Code of Professional Conduct may lead to corrective action depending upon the severity of the violation, investigation by the coordinating entity and/or L&I, referral made to the DSHS Language Testing and Certification Program (LTC) for a determination of whether the LAP should be allowed to retain his/her credential(s), or whether the credential(s) should be revoked, and/or subcontract termination.

Acceptance and Rejection of Appointments or No-Shows

LAPs are strongly encouraged to diligently monitor the WordBridge scheduling system. LAPs must proactively and responsibly accept assignments well in advance of their appointment time. In the event that it is necessary to reject a previously accepted appointment, LAPs should reject such appointment as promptly as possible and no later than 24 hours prior to the scheduled appointment time, including weekends and holidays. LAP late rejections without justifiable cause, habitual tardiness to scheduled appointments, or no-shows may result in corrective action according to the Incident Response Escalation Tables below. LAPs will be able to return appointments without penalty within 30 minutes of accepting an appointment.

Privacy Compliance

LAPs must conduct OPI and VRI services in private and secure locations to avoid unauthorized third parties from hearing or gaining access to the personal, health, or vocational information of the injured worker and crime victim for whom the LAP is providing interpretation. It is, therefore, imperative for LAPs to avoid disruptive public or semi-public settings that could compromise the

confidentiality of the interpretation session. LAPs should refrain from taking OPI and VRI appointments while outside the home, driving, at playgrounds, outdoor areas, or any public areas, or where loud disruptions can be heard by the injured worker, crime victim, or provider. In addition, LAPs must maintain the confidentiality of the personal, health, or vocational information of the injured worker or crime victim and may not publish or otherwise share such information except in accordance with law, particularly the <u>Privacy Rule of the Health Insurance</u> <u>Portability and Accountability Act of 1996 (HIPAA)</u>. Failure to protect such information as summarized above may result in corrective action if warranted and according to the Incident Response Escalation Table.

Other LAP Conduct

LAPs should refrain from engaging in any conduct that could lead to revocation of their authorized status with L&I. In particular, <u>Section 388-03-170 of the Washington Administrative</u> <u>Code</u> outlines specific behaviors that could lead to corrective action as described herein.

Incident Resolution Process

Incident Severity Levels

Low Severity

Classifies any violation against WAC 388-03-050 or any of the LAP requirements or expectations as set forth herein that have minimal impact on the appointment, provider, and/or LEP worker or crime victim.

Low severity incidents include, but aren't limited to:

- Provider reported an LAP's late arrival.
- LAP gives back appointment less than 24 hours before the scheduled start time once in 30 days.
- LAP left appointment earlier than the scheduled end time without provider approval.
- LAP did not interpret accurately, expressing the source language message in a thorough and faithful manner.
- LAP misuse of the scheduling system, such as not following electronic check in/out processes and/or submitting paper vouchers (if required in the event that the system is unavailable).
- LAP not available for the start time of an OPI or VRI scheduled appointment.
- Provider reported an appointment could not be completed due to technical reasons such as choppy audio or video on the LAP's end.

Medium Severity

Classifies any violation against WAC 388-03-050 or any other of the LAP requirements or expectations as set forth herein that has a moderate impact on the appointment, provider, and/or LEP worker or crime victim.

Medium severity incidents include, but aren't limited to:

- LAP is a no-show (without a valid reason or notification of extenuating circumstances).
- LAP gives back appointments less than 24 hours before the scheduled start time twice in 30 days.
- LAP solicits their services to the LEP worker or crime victim, their family members or provider.
- LAP expresses personal opinions or offers unwanted conversation.
- LAP services an acquaintance, family member, or friend without disclosing the potential conflict of interest.
- LAP asks the provider to enter incorrect start and/or end times.
- LAP engages in unsupervised discussions with the provider and/or LEP worker or crime victim.

- LAP contacts the provider or the LEP worker or crime victim directly, outside of the appointment.
- Harassment or unprofessional LAP behavior to State agency employees or employees of the coordinating entity.
- During an interpretation session, LAP uses a mobile device for any reason unrelated to the current interpretation services.
- During an appointment, LAP accesses the portal to accept, reject, dispute, review appointments or conduct other activities not related to the current interpretation services.
- During an interpretation session, LAP engages in any other activity deemed inappropriate and unrelated to the current interpretation services.
- LAP is not located in a secure HIPAA compliant space during an OPI or VRI appointments.

High Severity

Classifies any violation against WAC 388-03-050 or any other of the LAP requirements or expectations as set forth herein that has a significant or critical impact on the appointment, provider, and/or LEP worker or crime victim; including those violations that put the health and safety of any of the parties involved at risk.

High severity incidents include, but aren't limited to:

- LAP gives back appointments less than 24 hours before the scheduled start time four times in 30 days.
- LAP transports an LEP worker or crime victim to or from appointments.
- LAP requests or accepts money or favors from the LEP worker or crime victim or provider.
- LAP passes their appointments to other LAPs/interpreters.
- LAP falsifies an appointment invoice, including appointment start and end times.
- Behavior that displays discrimination or threatens another individual and violates the Civil Rights Act.
- Harassment, intimidation, and retaliation towards a provider, the LEP worker or crime victim, or another LAP.
- Any violation of HIPAA or conduct that threatens the health and safety of the LEP worker or crime victim, provider, facility staff, or coordinating entity personnel.
 HIPAA and Health and Safety violations will have an immediate 10-day deactivation or longer, pending the outcome of the incident.
- Violations involving LAPs sending unsecure PII or PHI information via email will have a 10-day WordBridge portal deactivation. If two violations occur within 1 year, the LAP will have a 90-day deactivation and will be required to provide proof of completion of an approved HIPAA training (at their cost) in order to be reinstated with coordinating entity. If an additional occurrence happens within the next calendar year, the LAP may be subject to immediate termination. A third HIPAA email violation will result in immediate termination.

Steps in the Resolution Process

- 1. Feedback is submitted to coordinating entity by authorized requestors, providers, LAPs, LEP injured worker or crime victim or their legal representatives, or L&I staff.
- 2. Once recorded, either by email, portal, or phone call, and validated by the coordinating entity, LAPs are notified within ten business days via email that they received feedback and details of the feedback are included in the notification.
- LAPs have ten business days to respond to coordinating entity in writing in order to dispute or explain the situation, except for HIPAA, PHI, PII, safety and health concerns, or other egregious conduct involving a high severity incident where LAPs may be subject to immediate suspension pending the outcome of the investigation.
- 4. Once coordinating entity receives the LAP's response, any necessary follow-up must be completed within twenty business days. In order to verify the validity of the LAP's response, coordinating entity may need to reach out to the authorized requestor, provider, claimant, or some other entity. LAPs must never contact the provider, authorized requestor, or claimant regarding the incident as this may be perceived as retaliation for providing feedback.
- 5. Coordinating entity will notify the LAP of the investigation's outcome and take any corrective action if warranted, according to the Incident Response Escalation Tables below.
- 6. LAPs are notified three business days prior to any portal restriction effective date.
- 7. Suspensions that result from potential safety and health concerns may be effective on the date of notification from provider, claimant, authorized requestor, or L&I, and remain in effect during the investigation period.
- 8. If feedback takes more than sixty days to resolve with the provider, claimant, authorized requestor, or L&I, or the incident is unable to be validated, the incident may be removed from the LAP's profile. This does not apply to Safety and Health violations as the investigation could take longer than sixty days to resolve.

Incident Tracking

Low severity incidents are tracked on a rolling 12-month time period. This means that incidents are removed from the LAP's record once that incident is 366 days old. These incidents do not disappear; they stay in the coordinating entity's incident management system for tracking purposes. Incidents that have reached the 366-day mark will not be used to apply any actions listed in the Incident Response Escalation Table.

Medium severity incidents are tracked on a rolling 12-month time period. This means that incidents are removed from the LAP's record once that incident is 366 days old. These incidents do not disappear, and they are maintained in the coordinating entity's incident management system. Incidents that have reached the 366-day mark will not be used to apply any actions listed in the following chart.

High severity incidents are tracked for the lifetime of the LAP's subcontract. There is no rolling time period, and high severity incidents never fall off the LAP's record. These incidents are subject to immediate action, up to and including termination of the LAP's subcontract with coordinating entity. All terminations resulting from a high severity incident are reported to L&I for review and may be reported to the LAP's credentialing entity for a determination of whether the LAP should be allowed to retain his/her credential(s), or whether the credential(s) should be revoked. This report will include all information from the provider, coordinating entity, state agency, other applicable parties, and the interview with the LAP.

HIPAA and PHI incidents are tracked for the lifetime of the LAP's subcontract. There is no rolling time period, and high severity incidents never fall off the LAP's record. These incidents are subject to immediate action, up to and including termination of the LAP's subcontract with coordinating entity. L&I will determine the outcome of each incident as a result of the severity level of the HIPAA and PHI incident. All terminations resulting from a high severity incident are reported to L&I and may be reported to the LAP's credentialing entity for a determination of whether the LAP should be allowed to retain his/her credential(s), or whether the credential(s) should be revoked. This report will include all information from the provider, coordinating entity, state agency, other applicable parties, and the interview with the LAP.

Termination of LAP Subcontract

LAPs are professional service sub-contractors for L&I clients and authorized requestors. Per the IRP, if an LAP fails to meet the requirements herein and incurs multiple incidents, an LAP may be terminated and will not be eligible to provide LAP services to L&I clients.

Prior to termination, L&I will review all documentation from coordinating entity and the LAP to ensure that all processes were followed. Exceptions to this process are HIPAA and PHI related breach or violations. Termination for these violations will be determined based on the outcome of L&I's review of coordinating entity's investigation.

Termination of subcontract will only happen with direct authorization of the L&I Interpreter Services Program Manager.

Credential Revocation Referral

When an LAP has engaged in conduct under this IRP that may justify revocation of the LAP's credentials and/or termination of the coordinating entity's subcontract with the LAP, the coordinating entity shall provide all documentation and its recommendation to L&I for review. L&I will conduct a review of the circumstances and make a determination of whether the LAP

should be referred to the applicable credentialing organization and/or the subcontract with the coordinating entity should be terminated. Please note that L&I and the coordinating entity do not make decertification determinations, which is the responsibility of the credentialing organization.

Revocation Referral

When an LAP has violated any provisions of WAC 388.03.170 or based on the results of the

investigation conducted by the coordinating entity, the coordinating entity is required to provide all documentation and recommendation for subcontract termination to L&I for review. L&I will conduct a review of the circumstances and make a determination of whether the LAP should be referred to DSHS LTC, the state agency responsible for LAP certification, per WAC 388-03-170. L&I and the coordinating entity do not make LAP decertification determinations.

Incident Response Escalation Tables

The following tables outline corrective actions to be taken by SOSi based on the number of incidents and their severity. Days listed are calendar days, not business days.

9	Permanent termination		
8	14-day deactivation with final warning		
7	7-day deactivation		
6	Maximum 20-day suspension	Permanent termination	
5	Maximum 10-day suspension	14-day deactivation with final warning	
4	Formal written notice	7-day deactivation	
3	Email alert	Maximum 20-day suspension	
2	Email alert	Maximum 10-day suspension	
1	Email alert	Formal written notice	
Number of incidents	Actions taken for Low Severity	Actions taken for Medium Severity	

4			
3			Permanent termination
2	Permanent termination	Permanent termination	90-day suspension**
1	Minimum 10-day deactivation with final warning*	Minimum 10-day deactivation with final warning*	Minimum 10-day deactivation with final warning*
Number of incidents	Actions taken for High Severity	Actions taken for HIPAA Breach or Health & Safety Incident	Actions taken for PHI Email Breach

*Severe incidents may result in an undetermined suspension pending the outcome of the investigation and/or termination.

**LAP must take HIPAA training at own expense and reapply.

Signature below indicates that LAP has read and fully understands L&I's Incident Resolution Process outlined in this document and agrees to abide by policies therein.

LAP Name (Print)

LAP National Provider Identifier (NPI)

LAP Signature

Date

Resources

L&I Become an Interpreter Website

L&I Administrative Policy, Chapter 14: Language Access Services

Guidance: How the HIPAA Rules Permit Covered Health Care Providers and Health Plans to Use Remote Communication Technologies for Audio-Only Telehealth | HHS.gov

WAC 388-03-050: What is the department's [DSHS's] code of professional conduct for interpreters, translators, and LAPL?

WAC 388-03-160: How do I maintain my certification or authorization status?

WAC 388-03-170: Can the department [DSHS] deny or revoke my certification or authorization status?

WAC 388-03-172: What procedures must the department [DSHS] follow if it denies or revokes my certification or authorization status?

WAC 388-03-173: What is the required timeframe to file a revocation request?

WAC 388-03-174: Can I appeal the decision to deny or revoke my certification or authorization?

WAC 388-03-176: How do I request an adjudicative hearing?

CODE OF PROFESSIONAL CONDUCT

WAC 388-03-050

What is the department's code of professional conduct for interpreters, translators, and LAPL?

The code of conduct is the professional standard established by the department for all interpreters, translators, and LAPL who provide language services to department programs and clients. Any violation of this code may disqualify a provider from providing those services. Specifically, the code addresses:

(1) **Accuracy.** Interpreters/translators must always express the source language message in a thorough and faithful manner. They must:

(a) Omit or add nothing;

(b) Give consideration to linguistic variations in both the source and target languages; and

(c) Conserve the tone and spirit of the source language.

(2) **Cultural sensitivity-courtesy.** Interpreters/translators must be culturally sensitive, and respectful of the individual(s) they serve.

(3) **Confidentiality.** Interpreters/translators must not divulge any information publicly or privately obtained through their assignments, including, but not limited to, information gained through access to documents or other written materials.

(4) **Proficiency.** Interpreters/translators must meet the minimum proficiency standard set by DSHS.

(5) **Compensation.** Interpreters/translators must:

(a) Not accept additional money, consideration, or favors for services reimbursed by the department. The fee schedule agreed to between the contracted language services providers and the department shall be the maximum compensation accepted.

(b) Not use the department's time, facilities, equipment or supplies for private gain or other advantage; and

(c) Not use or attempt to use their position to secure privileges or exemptions.

(6) Nondiscrimination. Interpreters/translators must:

(a) Always be impartial and unbiased;

(b) Not discriminate on the basis of gender, disability, race, color, national origin, age, socio-economic or educational or marital status, religious or political beliefs, or sexual orientation; and

(c) Refuse or withdraw from an assignment, without threat or retaliation, if they are unable to perform the required service in an ethical manner.

(7) **Self-representation.** Interpreters/translators must accurately and completely represent their certifications, training, and experience.

(8) **Impartiality-conflict of interest.** Interpreters/translators must disclose to the department any real or perceived conflicts of interest that would affect their professional objectivity. Note: Providing interpreting or translating services to family members or friends may violate the family member or friend's right to confidentiality, constitute a conflict of interest, or violate a DSHS contract or subcontract.

(9) **Professional demeanor.** Interpreters/translators must be punctual, prepared, and dressed in a manner appropriate, and not distracting for the situation.

(10) **Scope of practice.** Interpreters/translators must not:

(a) Counsel, refer, give advice, or express personal opinions to the individuals for whom they are interpreting/translating;

(b) Engage in activities with clients that are not directly related to providing interpreting and/or translating services to DSHS;

(c) Have unsupervised access to DSHS clients, including but not limited to phoning clients directly, other than at the request of a DSHS employee;

(d) Market their services to DSHS clients, including but not limited to, arranging services or appointments for DSHS clients in order to create business for themselves; or

(e) Transport DSHS clients for any business, including social service or medical appointments.

(11) **Reporting obstacles to practice.** Interpreters/translators must assess at all times their ability to interpret/translate.

(a) Interpreters/translators must immediately notify the parties if they have any reservations about their competency or ability to remain impartial and offer to withdraw without threat or retaliation;

(b) Interpreters/translators must immediately withdraw from encounters they perceive as a violation of this code.

(12) Professional development. As specified in WAC 388-03-160,

interpreters/translators are expected to continually develop their skills and knowledge through:

(a) Professional interpreter/translator training;

(b) Continuing education; and

(c) Regular interaction with colleagues and specialists in related fields.