

**CITY OF GREELEY
ADMINISTRATIVE RULE**

Number: 2011-6
Subject: Limited English Proficiency
Replaces: New
Effective: March 1, 2011

It shall be the policy of the City of Greeley to take reasonable steps to provide timely, meaningful access to Limited English Proficiency (LEP), deaf/hard of hearing, and blind/vision impaired members of our community to all services and programs provided by the City. Personnel shall provide, or ensure that assistance is obtained in providing, communication services free of charge to LEP, deaf/hard of hearing, and blind/vision impaired members of the public when obvious communication barriers exist and/or if the individual requests Communication assistance.

The purpose of this Administrative Rule is to recognize the importance of effective and accurate communication with all people in the community we serve. Communication barriers can impede effective and accurate communication in many ways and may inhibit or prohibit individuals with limited English proficiency (LEP), those who are deaf or hard of hearing, and those who are blind or vision impaired from accessing and/or understanding their rights, obligations, and available services. Limited ability to communicate with LEP, deaf/ hard of hearing, or blind/sight impaired victims, witnesses, alleged perpetrators, and members of the public can present safety, evidentiary, and ethical challenges for all City personnel.

DEFINITIONS

- A. Primary Language -- An individual's native tongue or the language in which an individual most effectively communicates.
- B. Limited English Proficiency (LEP) – Designates individuals whose primary language is not English and who have a limited ability to read, write, speak, or understand English. LEP individuals may be competent in certain forms of communication (e.g. speaking) while LEP in other forms (e.g. reading or writing).
- C. Bilingual – The ability to use two languages proficiently.
- D. Bilingual Employee – An employee who has demonstrated proficiency in a second language.
- E. Communication Aids – Auxiliary aid and services, which are used to communicate with people who are deaf or hard of hearing. These include the use of gestures, visual

aids, a TTY (teletypewriter) or TDD (telecommunications device for deaf people), pen and paper, or the use of a qualified oral interpreter, for those who speech or lip read, or a qualified sign language interpreter, for those whose primary language is sign language.

PROCEDURE

A. Language Line - Requesting Interpretation Services for LEP individuals.

Personnel in need of interpretation services shall:

- Attempt to identify the LEP individual's primary language or language of preference through the use of the Language Line Services Language Identification Card or by contacting the Language Line for assistance
1-800-874-9426
Client ID 536046
Organization name - City of Greeley
Your personal code (your employee number).
- If the language is not known, the service will initiate a language identification process. In most cases, an interpreter is available within 25 seconds.
- The operator may place you on hold while connecting to an interpreter.
- When the interpreter joins the conversation, personnel should provide any special instructions and explain the communication method he/she will be using: passing the handset back and forth, using a speakerphone, using an extension handset, etc. Avoid slang, jargon, acronyms or technical terms that may not interpret well into other languages and cultures, and may require more time to interpret.
- When the call is complete, advise the interpreter by stating "End of call."

B. Bilingual Interpreters – Utilizing existing personnel as interpreters

- Personnel are encouraged to request the assistance of a bilingual co-worker when available to ensure accurate and effective communication.
- Personnel are encouraged to use the City of Greeley Interpreters resource available from other City departments. These resources are available during normal business hours and can be found in the City Directory under “Multilingual Employee Resource Guide. The Language Line Services should be limited to emergencies where no other resources are available or in the Police Communications Center where timely identification of the nature of the emergency is critical to a safe and successful resolution.
- When exigent circumstances exist, personnel are to use the most reliable interpreter available. Personnel may utilize Victim Services Volunteers, City employees, LEP family members, or friends to translate. Personnel should be mindful that using friends, family members or bystanders to interpret could result in a breach of confidentiality, a conflict of interest, or inadequate or inaccurate interpretation. Personnel should attempt to avoid using minor children for use as interpreters.

- Once exigency has passed, personnel should consider utilizing bilingual co-workers, the Language Line Services, or other available interpreters for communication with LEP individuals to ensure accurate communication.

C. Deaf or Hard of Hearing Interpretation Services – Utilization

- Personnel will attempt to identify the individual's preferred method of communication through writing. Personnel may be advised that the individual can speak or lip-read, or that a sign language interpreter is needed. Every attempt should be made to communicate in the requested method; however, if there is another equally effective way of communicating, given the circumstances, length, complexity, and importance of the communication, then personnel may choose to attempt an alternate method.
- When exigent circumstances exist, personnel are to use the most reliable interpreter available. Personnel should be mindful that using friends, family members or bystanders to interpret could result in a breach of confidentiality, a conflict of interest, or inadequate or inaccurate interpretation. Personnel should attempt to avoid using minor children as interpreters.
- Once exigency has passed, personnel should consider utilizing bilingual co-workers, the Language Line Services or other available interpreters for communication with LEP individuals to ensure accurate communication.
- If an oral interpreter or sign language interpreter is requested, personnel should attempt to obtain information as to which language is used (the most common are American Sign Language or Signed English), prior to determining if an interpreter is available.
- The Greeley Police Department 911 Emergency Center has TDD services available for those individuals who wish to communicate with the police department. The service can be reached through a direct line published in the phone books as well as through the emergency 911 number.

D. Blind or Visually Impaired – Communication

- Individuals who are blind or visually impaired may also present a communication challenge.
- Visual impairment exists on a spectrum. Personnel may encounter individuals ranging from partially sighted to completely blind. Services provided by the City departments may vary depending on the individual's abilities.
- When encountering a person who is visually impaired or blind, personnel should:
 - a. Identify themselves.
 - b. Make sure that the individual with the sight impairment knows that you are speaking to them. You may touch them lightly on the arm or shoulder if needed to gain their attention or use their name preceding comments or questions directed to them.
 - c. Tell the individual what you intend to do before you do it, if possible.
 - d. Read aloud completely any documents you may be referring to during the encounter.

If you are requested to lead an individual with a sight impairment:

- a. Allow the individual to grasp your arm just above the elbow.
- b. Walk slightly in front of the individual.
- c. Stop completely before going up or down stairs or curbs.
- d. When entering a doorway, advise the individual which direction the door opens.
- e. Never grasp an individual who is blind or vision impaired by the arm to lead them.
- f. Offer to assist, but do not insist.
- g. Follow the individual's instructions.

E. When a Service Animal is in Use

1. Never pat or interfere with the service animal.
2. Do not separate the service animal from its owner.

F. Translated Documents and Public Notices

1. Vital Documents

- a. Documents deemed to be vital documents by the department director or designee will be translated into languages designated by the department director or designee.
- b. All translated vital documents will be available to impacted personnel as well as the general public.

2. Non-vital documents

- a. Requests for translation of non-vital documents must be made to the department director or designee.

3. Public Notification of Communication Services

- a. At city facilities, signage shall be posted in languages designated by the City Manager or his designee reading that interpreters are available free of charge to any individual requesting or requiring the services.

4. The City of Greeley will make every attempt to provide educational or information materials in the LEP's proficiency language.

G. Court Interpreters – Witnesses, Defendants, and Criminal Proceedings

1. Officers will note on all summons and criminal complaints the need for a court interpreter along with the specific language spoken.

2. The Municipal Court Clerk will arrange for an interpreter to be present at trial to aid in communication. Interpreters are provided at no cost to the defendant.

3. County Court and District Court will provide interpreters consistent with their operating procedures.

TRAINING AND RECRUITMENT

Citywide training and educational tuition assistance programs provide employees an opportunity to learn or develop basic or more advanced conversational foreign language skills.

The City of Greeley has an ongoing recruitment process where Spanish speaking employees are sought for positions requiring heavy public contact. This is evident in job announcements that indicate Spanish/English bilingual skills required or Spanish/English bilingual skills highly desirable.



Roy H. Otto

March 3, 2011

Date