



LANGUAGE ACCESS PLAN

Houston Police Department

January 31, 2014

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PURPOSE

On July 31, 2013, Mayor Annise Parker signed Executive Order 1-17 under the authority of Article VI, Section 7a, of the City Charter of the City of Houston. The order mandates all City Departments to establish policies for providing information about City services, programs, and activities to residents and visitors with limited English proficiency (LEP).

The Language Access Executive Order calls for the translation of essential public information into five languages other than English for which there is the greatest need among Houston residents. The Office of International Communities has conducted a data-driven language needs assessment, working closely with City departments, international community leaders and stakeholders, and University-based experts, and identified the following five languages as the top five commonly-used languages utilized by the City's culturally diverse population: Spanish, Vietnamese, Chinese, Arabic and Urdu.

The Language Access Executive Order is aligned with Mayor Parker's commitment to strengthening the City's economy and improving the quality of life for all Houstonians.

As per the requirements of Executive Order 1-17, the Houston Police Department (HPD) has prepared this Language Access Plan ("LAP" or "Plan") in order to create a set of protocols for providing meaningful access to HPD's services, programs, and activities (both written and orally communicated) to LEP individuals.

DEPARTMENT INFORMATION

HPD MISSION

The mission of the Houston Police Department is to enhance the quality of life in the City of Houston by working cooperatively with the public to prevent crime, enforce the law, preserve the peace, and provide a safe environment.

- **Preserve and Advance Democratic Values**

We shall uphold this country's democratic values as embodied in the Constitution and shall dedicate ourselves to the preservation of liberty and justice for all.

- **Improve the Quality of Community Life**

We shall strive to improve the quality of community life through the provision of quality and equitable services.

- **Improve the Quality of Work Life**

We shall strive to improve the working environment for the department's employees by engaging in open and honest communication and demonstrating a genuine concern for one another.

- **Demonstrate Professionalism**

We shall always engage in behavior that is beyond ethical reproach and reflects the integrity of police professionals.

- **Principles**

Life and individual freedoms are sacred.

All persons should be treated fairly and equitably.

The role of the police is to resolve problems through the enforcement of laws - not through the imposition of judgment or punishment.

The neighborhood is the basic segment of the community.

Because law enforcement and public safety reflect community wide concern, the police must actively seek the involvement of citizens in all aspects of policing.

The fundamental responsibility of the police is provision of quality services.

The department's employees are its most valuable asset.

Employee involvement in departmental activities is essential for maintaining a productive working environment.

Employees should be treated fairly and equitably in recognition of basic human dignity and as a means of enriching their work life.

Goal of the HPD's Language Access Plan

HPD recognizes the diverse nature of the greater Houston community and strives to provide prompt and effective communication between department personnel and those individuals in need of police services, including those persons who are limited English proficient. HPD utilizes various department and community resources to remove language barriers that may impede vital communications between employees and LEP persons.

Department Divisions

- Refer to HPD's most recent Organization Chart

Contact Information

Director: Regina Woolfolk
1200 Travis, 21st Floor
Houston, Texas 77002
Phone: 713-308-3228
Email: Regina.Woolfolk@houstonpolice.org

Language Access

Coordinator: Troy Finner, Lieutenant
1200 Travis, 21st Floor
Houston, Texas 77002
Phone: 713-308-3212
Email: Troy.Finner@houstonpolice.org

KEY DEFINITIONS

Limited English Proficient (LEP): For the purposes of this plan and the activities to be undertaken in its execution, an LEP individual is someone whose primary language is not English and who possesses a limited ability to read, speak, write or otherwise understand the English language. Individuals maintain the right to self-identify as a LEP person and the department shall attempt to provide effective, free language assistance whenever an LEP person requests language assistance services.

Essential Public Information: As per the Executive Order, “Essential Public Information” is any information developed or used by the Houston Police Department and deemed vital for purposes of public safety, public health and economic development. This term is used interchangeably with the term “vital documents.”

Interpretation: Conveying meaning orally from one language into another language while retaining the same meaning.

Translation: Conveying meaning in writing from one language into another language while retaining the same meaning.

Bilingual: Any individual who is able to read, speak or write two languages fluently and communicate directly and accurately in both English and another language.

Certified Employee Interpreter: Any employee who has passed the appropriate language proficiency test and is therefore qualified to serve as an interpreter.

Department Resources For Communicating With LEP Persons (per G.O. 500-23)

The Houston Police Department shall take reasonable steps to develop in-house language capacity through training or by hiring personnel with specific language skills. The following department resources are available for communicating with LEP persons.

Bilingual Employees and Certified Employee Interpreters: The department has bilingual employees and certified employee interpreters who provide language assistance to LEP persons in Spanish, Vietnamese, Korean, Cantonese, Mandarin, Arabic and Urdu. The department provides incentive pay to bilingual employees whose language skills are deemed critical to the mission of their job assignment. Certain employees are certified and qualified to serve as interpreters as it relates to court proceedings. Civilian certified employee interpreters are certified by the City of Houston, while officers are certified by a language vendor. The department has a total of 1,193 bilingual employees and certified employee interpreters who are provided bilingual pay and who provide language assistance to LEP persons in Cantonese, Korean, Mandarin, Spanish and Vietnamese.

Foreign-Language Training: In an effort to improve employees' ability to independently communicate with LEP persons, HPD offers several foreign-language training curricula in different formats. Employees interested in foreign-language training should contact the Training Division for details and scheduling.

Interpreter Services: The department maintains a contract for professional interpretation and translation services. Professional interpreters and translators shall be requested by a supervisor only.

Language Line: AT&T provides language assistance in over 150 languages by making interpreters available to the department via telephone. Because this is a fee-based service, prior supervisor authorization is required.

Foreign Language Identification Flashcards: The Training Division shall provide employees foreign language identification flashcards ("I Speak" cards) that allow LEP persons to select their primary language from a list of 38 different languages. This shall assist employees in identifying the language if interpretation services are needed.

LEP Posters: LEP posters are displayed in public areas of all HPD buildings. These posters list six different languages and advise persons that language assistance is available upon request.

Department Forms: In an effort to provide assistance to LEP persons, many common police-related forms are available in Spanish, Vietnamese, Chinese, Arabic and Urdu. Employees should check the department's Intranet Portal or the concerned division to determine which translated forms are available.

Community Meetings: The department strives to foster positive interactions with all members of our community. Throughout the department, several community meetings are held in languages other than English. Employees should contact their division commander for additional information.

LANGUAGES COVERED

Executive Order 1-17 mandates City departments provide essential public information in *a minimum* of the City's top five commonly-used languages. Given the particular nature of interaction, both orally and in writing, the City has determined, for purposes of the Executive Order, that essential public information shall be translated in the following languages:

1. Spanish
2. Vietnamese
3. Chinese
4. Arabic
5. Urdu

The top five languages in the above list might not necessarily cover the languages of all individuals seeking programs, services, and activities from the department. "If an LEP person seeks information about a document that is not translated into one of the languages listed above, then the department shall provide competent oral interpretation of that document in the LEP person's primary language."

LANGUAGE ACCESS SERVICES

HPD proposes a number of activities to fulfill its responsibilities under Executive Order 1-17. The sections below describe HPD's approach to determining what to translate or provide interpretation services for, how to do this, and how to gauge whether the plan is working.

Translation of Essential Public Information and Vital Documents

HPD will use the following criteria for determining what constitutes "Essential Public Information":

1. On an annual basis, each Division Commander shall submit documents they deem to be Essential Public Information to the Language Access Coordinator. These documents will then be provided to the Planning Office for final review and approval for translation into Spanish, Vietnamese, Chinese, Arabic and Urdu. The Department shall use the City-wide translation vendor to translate the documents.
2. On an annual basis, the Planning Office shall determine whether the documents identified as Essential Public Information should be translated into additional languages. The department's Planning director shall assess demographic data, review utilization of contracted language access services, and periodically consult with community based organizations in order to determine if there are additional languages into which vital documents should be translated. When feasible, the department shall utilize the City-wide translation vendor to translate the documents into additional languages.
3. All translated documents will be posted on the department's website.
4. The Inspections Division shall serve as the custodian of all vital documents that have been translated.

Implementing Translation of Essential Public Information and Vital Documents

In order to translate the essential public information outlined in the section above, HPD will use the following resources and processes:

1. Documents identified as essential public information will be translated using the City's approved vendor for translation/interpretation services in accordance with procedures set out by the City.
2. To ensure quality assurance, all documents that have been translated by the City-approved vendor will be reviewed by the Community Language Access Committee of the Mayor's International Communities Advisory Task Force, and the Language Access Coordinator's.
3. If the documents are approved for translation, they will then be made available online to the public in a PDF format on the Department's webpage.
4. When feasible, the documents in print format will be made available in public areas.
5. If the documents do not meet the quality assurance standards identified by the committee, the committee will send the documents back to the City-approved translation vendor with specific instructions that will improve the content of the information.
6. If the documents are approved by the committee, they will be sent to the Department's Planning Director.
7. Copies of the approved document will be on file with the HPD Inspections Division.
8. Essential Public Information/Vital documents will be reviewed annually by the Planning Office to determine if additional documents should be translated and/or if the information is still relevant or up to date.

Interpretation Services (per General Order 500-23)

When HPD conducts in-person or telephonic or otherwise orally-communicated business with the members of the community, the department will provide, when feasible, interpretation services for LEP individuals.

Interpretation services offered to the public in person or telephonically will be provided through either an on-duty Houston Police Department certified employee interpreter, an off-duty certified employee interpreter, a professional interpreter [currently Nightingale Interpretation Services (records maintained by Budget & Finance)] or through a Language Line service [provided by AT&T (records maintained by Emergency Communications Division)].

Protocol for Providing Language Assistance

When it is apparent in police-related matters that effective communication may not occur due to a language barrier, employees must attempt to provide effective, free language assistance, including whenever an LEP person requests language assistance services.

Field Encounters

When providing language assistance in the field, employees may request an on-duty certified employee interpreter via the dispatcher. If an on-duty certified employee interpreter is not available, employees shall contact their supervisor, who shall determine if the situation necessitates the use of an off-duty certified employee interpreter, professional interpreter, Language Line, or other department language resource.

If an emergency exists, employees shall act in the best interest of the LEP person. The well-being of the LEP person involved is of the utmost concern. Employees are to use the most reliable, temporary oral language assistance available to obtain basic facts such as descriptive information on a fleeing suspect or identifying information of an injured person.

In non-emergency circumstances, employees should use only family, friends, or bystanders for interpreting in very informal, non-confrontational contexts, and only to obtain basic information at the request of the LEP person. Using family, friends, or bystanders to interpret could result in a breach of confidentiality, a conflict of interest, or an inadequate interpretation.

Barring exigent circumstances, employees should not use minor children to provide interpreter services. Employees must be aware that having an interpreter come to the scene is a lengthy process; it may take several hours before one arrives.

Employees shall list the following within the body of an incident report or traffic citation:

- a. The language and dialect used or needed to communicate with the LEP person.
- b. That an interpreter was used or is needed for further investigation.
- c. Pertinent information about the interpreter, including the person's name, address, telephone contact information, and license or certificate numbers.

Booking or Ticketing Suspects

Jail Division

When a prisoner is booked at a City jail or police station lockup facility and language assistance is needed, a Jail Division supervisor or designee shall:

- a. Provide the prisoner an interpreter in the following manner:
 1. Use an on-duty certified employee interpreter first before using a professional interpreter.
 2. If the use of a professional interpreter is warranted, a Jail Division supervisor or designee shall contact the Crime Analysis and Command Center to have one assigned.
 3. If a specific certified employee interpreter or professional interpreter is needed or was used previously with the prisoner, the Jail Division supervisor or designee shall inform the Crime Analysis and Command Center, who shall make a reasonable effort to contact that same person.
- b. Note on the person's Criminal History Record:
 1. The prisoner's need for an interpreter and the language and dialect of the prisoner (if known).
 2. If the prisoner requested an interpreter.
 3. The name of any interpreter used, and the date and time the interpreter was contacted.

c. Notify the court that an interpreter may be required if the prisoner is to be arraigned before a municipal court judge.

Employees shall not use other prisoners to provide language services, barring exigent circumstances.

Booking Blotter, Ticket, and Incident Report

Employees shall list the following information on the booking blotter or ticket, and within the body of the incident report (if generated):

- a. The language and dialect used or needed to communicate with the prisoner.
- b. That an interpreter was used or is needed for further investigation.
- c. Information about the interpreter, including the person's name, address, telephone contact information, and license or certificate numbers.

INTERROGATION OF LEP SUSPECT(S)

When interrogating a detained suspect who is an LEP person, a certified employee interpreter shall be utilized first. If a certified employee interpreter is utilized, the entire interview shall be recorded and the LEP person shall be informed of the certified employee interpreter's dual role. In the event a certified employee interpreter is not available, a professional interpreter shall be utilized.

If a professional interpreter is utilized, the interrogation of the LEP suspect shall take place, if feasible, in a room equipped with audio and visual technology.

Interviews and Complaints Involving LEP Persons

When interviewing an LEP victim or witness, employees should rely on an on-duty certified employee interpreter. When handling a complaint involving an LEP person, employees should rely on an on-duty certified employee interpreter or the Language Line. HPD shall translate written communications with LEP victims, witnesses, and complainants into that person's primary language.

If an emergency exists, officers are to act in the best interest of the citizen or prisoner. The well-being of the citizen or prisoner involved is of the utmost concern.

RESPONSIBILITIES

Investigators

Investigators who need an interpreter shall follow the guidelines set forth in this General Order. Investigators shall try to use on-duty certified employee interpreters first before using a professional interpreter. If a professional interpreter is warranted, investigators shall contact the Crime Analysis and Command Center to have one assigned. If a specific interpreter is needed, the investigator shall request the Crime Analysis and Command Center to contact that interpreter.

Supervisors

When an employee calls a supervisor to request the assignment of an off-duty certified employee interpreter or professional interpreter to a police scene, the supervisor may elect to report to the scene to further assess the situation. If it is determined that an off-duty certified employee interpreter or professional interpreter is needed, the supervisor shall contact or have the dispatcher contact the Crime Analysis and Command Center to have one assigned.

Dispatchers

Dispatchers have the authority to dispatch the following on-duty certified employee interpreters in the following order:

- a. Officer within the beat
- b. Officer within the district
- c. Civilian employee within the beat
- d. Civilian employee within the district
- e. Any on-duty officer
- f. Any on-duty civilian employee

Any other certified employee interpreter must be approved by the Crime Analysis and Command Center before being assigned to the incident.

Employee Services Division

The Employee Services Division (ESD) shall maintain an accurate and current list of all bilingual employees and certified employee interpreters. The ESD shall provide the current list to the Crime Analysis and Command Center on a quarterly basis or earlier if requested or if the list is updated.

Crime Analysis and Command Center

Only the Crime Analysis and Command Center may assign the below listed certified interpreters, in the following order:

- a. Any off-duty officer
- b. Any off-duty civilian employee
- c. A professional interpreter or use of the Language Line service

Division Commanders

Division commanders may authorize the use of an off-duty certified employee interpreter or a professional interpreter. The division commander shall contact the Crime Analysis and Command Center, which shall then contact the appropriate interpreter.

Implementation of Interpretation Services

In order to provide interpretation services outlined in the section above, the Houston Police Department will use the following resources and processes:

1. HPD will determine and create a list of employees in the department who are bilingual and employees who are certified employee interpreters. The list shall contain the employee's name, contact information, and the language(s) other than English they read, speak or write.
2. The contact list will be maintained by the department's Employee Services Liaison.
3. The Employee Services Liaison will ensure the Crime Analysis & Command Center is provided with the most current contact list.

Monitoring, Evaluation & Documentation of Translation & Interpretation Program

In order to ensure effective and efficient implementation of HPD's Language Access Plan, HPD plans to conduct the following routine monitoring, evaluation, and documentation of the language access plan implementation. HPD understands that this internal process can inform, but does not substitute, reporting requirements established under Executive Order 1-17 and that (will be or have been) shared with HPD by the Mayor's designee.

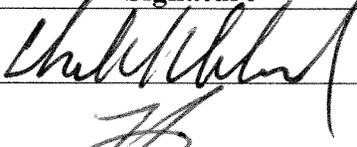
1. On an annual basis, each Division Commander shall submit documents they deem to be Essential Public Information to the Language Access Coordinator.
2. These documents will then be provided to the Planning Office for final review and approval for translation into Spanish, Vietnamese, Chinese, Arabic and Urdu.
3. The Department shall use the City-wide translation vendor to translate the documents.
4. Once the documentation is translated it will be given to:
 - a. The concerned division
 - b. Print Shop to print vital document(s)
 - c. Public Affairs to be put on the department's website
 - d. The Planning Office for record keeping purposes
 - e. Inspections Division shall serve as the custodian of all vital documents that have been translated in addition to the Language Access Coordinator.

EMPLOYEE TRAINING

The Mayor's Office Language Access Designee shall provide training for department employees who routinely have direct, substantive interaction with the public (front-line employees) in language access policies and procedures, including protocols for assisting LEP populations.

In addition to the training outlined above, HPD shall provide periodic training to employees about the department's LEP policies, including how to access telephonic and in-person language assistance. HPD shall conduct such training for new recruits at pre-service training at the Academy and at roll call for officers on a periodic basis as deemed necessary by the Chief of Police.

DEPARTMENT SIGNATURES & CONTACTS

Title/Name	Signature	Contact Info
Chief of Police Charles A. McClelland, Jr.		Phone: 713-308-1600
Language Access Coordinator: Troy Finner, Lieutenant		Phone: 713-308-3212