

Honolulu Board of Water Supply Language Access Assistance Program

I. **POLICY**

The Honolulu Board of Water Supply (BWS) is committed to providing Limited English Proficient (LEP) individuals with access to no-cost language translation and interpretation services.

II. **BACKGROUND**

- A. The BWS recognizes the importance of effective communication between its employees and the public. Language barriers can often hinder or prevent people with LEP from accessing BWS services, understanding important information about the safety, quality and delivery service of their water.
- B. Hampered communication with LEP individuals can present public health issues and challenges.
- C. Title VI of the Civil Rights Act of 1964; Executive Order 13166 (2000); Hawaii Revised Statutes (HRS) 321C were established to ensure that agencies do not discriminate against individuals based on national origin and that they provide these LEP individuals meaningful access to programs and activities.

III. **DEFINITIONS**

Annual BWS Employees with Foreign Language List: A document listing all BWS departmental personnel authorized to provide language interpretation and translation services. This list is prepared and updated by the BWS Human Resources Office and is distributed to all divisions.

Bilingual: The ability to use two languages proficiently.

Department Authorized Interpreter (DAI): A bilingual BWS employee who has been authorized by the BWS to interpret for others in certain situations.

Interpretation: The act of listening to communication in one language (source language) and orally converting it to another language (target language).

Language Access Assistance: Providing meaningful language access service to people with LEP. Generally, this involves notifying people that language access services are available free of charge and when requested.

Language Access Policy Coordinator (LAPC): The Information Officer of the BWS Communications Office shall ensure that the BWS is in compliance with the Language Access Assistance Program.

Person with Limited English Proficiency: An individual whose primary language is not English and has a limited ability to read, write, speak, and/or understand the English language. May also be referred to as persons with LEP, LEP individuals, LEP people.

LEP individuals may be competent in certain types of communication (e.g., speaking, understanding) but still be considered LEP for other purposes (e.g., reading, writing).

Primary Language: An individual's native language in which an individual most effectively communicates.

Translation: The conversion of written text from one language (source language) to another language (target language) while retaining the same meaning.

IV. PROCEDURES FOR ACCESSING INTERPRETATION SERVICES

- A.** Interpreter services needed at Customer Care
The Customer Care division shall inform LEP individuals that language interpretation assistance is available. Division personnel shall refer to LAAP guidelines for reference.
- B.** Interpreter services needed out in the field
The Investigators or meter readers shall inform LEP individuals that language interpretation assistance is available. Investigators or meter readers shall notify LAPC to coordinate telephonic interpretation services with department-authorized interpreter or contracted telephonic interpretation service to provide language access assistance.
- C.** Interpreter services needed at Board Meeting
Any individual requiring language assistance shall notify the BWS at least three business days prior to the meeting date.
- D.** In any situation where interpretation services are needed, the LAPC shall document the location, form/document and services utilized to provide adequate language assistance.

V. COMPLAINTS

- A.** Complaint procedures for LEP Individuals
Any LEP individual who wishes to file a complaint with the department regarding language interpretation and translation access or alleged employee misconduct shall do so in written format and shall be submitted to the LAPC for follow-up.

VI. LANGUAGE ACCESS ASSISTANCE PROGRAM COMMITTEE

- A.** A Language Access Assistance Program (LAAP) committee shall be made up of the LAPC and one representative from each of the following divisions: Communications Division, Customer Care, Human Resources, Finance, Field Operations, Water Quality, IT
- B.** The committee shall meet annually, or as needed to:
 - 1. Review the LAAP annual report, demographic data, and review contracted language access services utilization data;
 - 2. Examine BWS documents to determine which ones should be translated into different languages and any other related language access issues; and
 - 3. Consult with the appropriate community organizations in order to determine translation and interpretation needs for the department.

VII. REQUESTS FOR DEPARTMENTAL DOCUMENT TRANSLATION SERVICES

- A. Customers may request to have a departmental document translated into a foreign language. Requests for document translation shall be submitted to the LAPC. The LAPC shall keep a file of the translated forms available in the department.

VIII. NOTIFICATION OF LANGUAGE ACCESS SERVICES TO THE PUBLIC

- A. The BWS PSB shall display signs of the most commonly spoken foreign languages informing the public that language interpretation and translation services are available at no-cost to the individual.
- B. The BWS shall maintain translated written forms and documents to use when interacting with LEP individuals.
- C. In situations where the LEP individual is illiterate or the foreign language translation is not available, those forms and documents shall be read to the LEP individual in their respective language by a DAI or department-contracted interpreter.

IX. LANGUAGE ACCESS ASSISTANCE PROGRAM AND INTERPRETER SKILLS TRAINING

- A. The BWS shall provide training to departmental personnel with regard to the language access program, indicate the CO Information Officer as the LAPC, and include how to access the department-authorized telephonic and in-person interpreters. Training shall be provided to sworn, permanent and contract and volunteer employees at least every two years.
- B. As determined by the LAAP committee, DAIs should have their language skills evaluated periodically. This may include an evaluation and assessment by a professional interpretation service provider.
- C. The LAPC shall be responsible for providing all BWS employees with the information on how to access the BWS LAAP.

X. MONITORING AND UPDATING LANGUAGE ASSISTANCE EFFORTS

The LAPC shall be responsible for coordinating and implementing this policy for the BWS. The duties of the LAPC are as follows:

- A. Serve as a member of the LAAP committee to determine language translation and interpretation requirements for the BWS.
- B. Review BWS reports and/or other documents periodically to determine if there is need for a DAI or contracted interpreter for a specific language. The LAPC will then be able to determine language access assistance needs.
- C. Assess demographic data, review contracted language access services, review all complaints filed, and may consult with community-based organizations to determine language access assistance needs for the BWS.
- D. Collect data regarding the BWS LEP contacts. This data may be collected through the review of BWS reports, billing statements submitted by the contracted telephonic and in-person service providers, and information provided by the various divisions that have had interaction with LEP individuals.

- E. Ensure that the public has access to language services available within the HPD.
- F. Submit an annual report to the BWS Manager and Chief Engineer and members of the LAAP committee regarding the effectiveness of the BWS's language access assistance services.