BUSINESS POLICY MEMORANDUM

EFFECTIVE DATE: November 8, 2021

DATE REVISED: November 8, 2021

DATE ISSUED: November 8, 2021

NO./SUBJECT: 4-27 CITY OF AURORA- LANGUAGE ACCESS PLAN (LAP)

AUTHOR/DEPARTMENT: Office of International and Immigrant Affairs

I. POLICY

The City of Aurora (City) recognizes the importance of effective and accurate communication between its personnel and the community that it serves. This Language Access Plan sets forth the actions we will take to ensure that persons with Limited English Proficiency ("LEP") have meaningful access to City services, programs, and activities. In accordance with federal guidelines, the City will make reasonable efforts to provide or arrange for free language assistance for its LEP persons.

II. SCOPE

This policy applies to all City employees.

III. RESPONSIBILITIES

It is the responsibility all City employees to understand that the purpose of this Policy is to help all City employees better communicate with and serve residents with Limited English Proficiency in compliance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166 “Improving Access to Services for Persons with Limited English Proficiency.”

IV. PROCEDURES

The City will take appropriate steps to assure that all LEP persons can obtain information concerning the existence and location of City programs, services, activities and facilities. The City will provide language assistance services for the top 10 designated languages in the City. Services include the translation of documents, interpretation during city government meetings, and phone interpretation services.

After extensive research, the City identified the top 10 languages spoken in Aurora as:

9. Russian  10. French
Meeting Interpretation
- The City will provide in-person Spanish interpretations for all formal City Council meetings during the PUBLIC INVITED TO BE HEARD section of the agenda.
- Other language interpretation can be requested by contacting the Office of International and Immigrant Affairs at 303.739.7521 no later than the Friday preceding the Monday Council meeting.
- Interpretation for public hearings, community meetings, or other similar City activities can be coordinated by City staff through an interpretation ticket request.

In-Person/Phone Communications
- All requests for interpreter services must be submitted 3 days before services are needed.
- Use of the Voiance International Line for interpretation is suggested for one-on-one interactions when a three-way phone conversation with a human interpreter is needed. Voiance offers interpretation in 150 languages.

Written Communications - Translation
- The City will prioritize translations of city documents in the top 5 languages when translations are necessary, while documents that are related to public safety, emergencies, and/or health and safety will be translated in the top 10 languages in the city.

LAP DISTRIBUTION
The LAP will be accessible from all City offices and from the City's website.

FEEDBACK AND COMPLAINTS
- All feedback referencing the Language Access Plan should be sent to language@auroragov.org.
- Complaints should be sent to OfficeofDEI@auroragov.org The City will investigate the complaint to determine if a violation of this policy has occurred. Following such an investigation, the City will make a determination regarding the complaint, and if necessary, take corrective action.

V. APPROVAL
Approved upon signature of City Manager

James M. Twombly
City Manager

11/10/2021
Date
Aurora’s Language Access Plan
Summary

The Language Access Plan (LAP) is a resource document for the City of Aurora’s departments, staff, elected officials and contracted vendors. It contains policies, procedures and practices to help Aurora city employees better communicate with and serve residents with Limited English Proficiency. This plan was compiled by Aurora’s Office of International and Immigrant Affairs, after extensive research on best practices in updating the city’s previous plan.

Aurora’s Demographic
Aurora is Colorado’s most international city and one of the most diverse cities in the country. Approximately 70,000 of the 366,000 people in Aurora, or about one out of every five of our residents, was born outside of the United States. Aurora’s residents come from 140 different nations, with children in the community speaking more than 150 different languages in our public schools.

Aurora’s international community is one the city’s greatest assets. Our immigrants and refugees are also helping to build a stronger and more secure Aurora from within. They are starting businesses, supporting law enforcement and contributing to the civil fabric our community.

The City of Aurora is national leader in immigrant integration and was recognized for its achievements throughout 2017. The City was named as a Best Practice Model in the area of immigrant integration and local government in the U.S. by the Strong Cities Network, was recognized by the National League of Cities with its “City Cultural Diversity Award” and was recognized by the Denver Regional Council of Governments with its “Metro Vision Award” for best program in the region.

Mission
Providing meaningful access to services for our residents with Limited English Proficiency (LEP) is a strategic goal for the City. Title VI of the Civil Rights Act of 1964 and Executive Order 13166 have provided the City with limited guidance on how to best serve our LEP residents.

In 2000, the United States Department of Health and Human Services (HHS) published policy guidance on Title VI’s prohibition against national origin discrimination as it affects Limited English Proficient persons, clarifying that the act extended to taking adequate steps to ensure that LEP residents received the language assistance necessary to provide them access to services, free of charge. That same year, Executive Order 13166 was signed with the intent to improve access to services for persons with Limited English Proficiency. Each of these outlined general parameters for how government entities could provide these services.

While providing services for LEP residents is federally mandated, Aurora has sought the best ways to implement those mandates to assist employees and residents.

Background
In 2014, the City of Aurora developed its first language access plan—three tiers of service—to assist the city’s Limited English Proficiency (LEP) population. In 2018, the city deemed the program no longer effectively served Aurora’s continuously-growing population with Limited English Proficiency.
In an effort to better serve these residents, the city manager tasked the Office of International and Immigrant Affairs (OIIA) to manage the city-wide LAP. The OIIA took over the program in early 2019.

**Language Access Policy and Goal**

In 2019, the city of Aurora worked with outside consultants to assess which areas should be the focus of the city’s immigrant integration plan. That work resulted in 2020-2030 Immigrant Integration Plan that focuses on 12 goal areas for the city of Aurora.

Number 5 on the list of goals states: “Ensure city services are accessible to speakers of other languages: The city will continue to develop and implement its Language Access Plan, so that city staff can interact with and deliver city services to all residents of Aurora, no matter what language they speak.”

With the goal identified and 41 percent of Aurora city employees responding that they interact with LEP residents on a daily basis, the city prioritized providing services. The OIIA looked for the best services to assist city employees as they meet the city policy to provide language access to LEP resident in Aurora, as mandated by the federal government.

**Assessment and Implementation**

In August 2018, an interdepartmental team, consisting of representatives from the Human Resources Department, the Communications and Marketing Department, the Office of International and Immigrant Affairs, and the Assistant City Manager, was created to develop and implement a Language Access Plan for the City.

The team asked Root Policy Research, a Denver-based firm, to conduct a needs assessment on the city’s language access services. Root conducted two surveys to gather information on what the most pressing language access needs were for Aurora’s city departments. The study included a survey of city staff, a survey of departmental leaders, and focus groups of department leaders.

The report that resulted from the study identified issues that LEP residents have with city communications and noted where resources were insufficient in meeting the needs for interpretation and translations.

<table>
<thead>
<tr>
<th>Commonly Encountered Languages</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>6</th>
<th>7</th>
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<tr>
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<td>6%</td>
<td>21%</td>
<td>11%</td>
<td>19%</td>
<td>9%</td>
<td>9%</td>
<td>8%</td>
<td>44%</td>
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<td>7%</td>
<td>9%</td>
<td>2%</td>
<td>10%</td>
<td>28%</td>
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<tr>
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<td>10%</td>
<td>20%</td>
<td>9%</td>
<td>9%</td>
<td>9%</td>
<td>4%</td>
<td>4%</td>
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<td>11%</td>
<td>12%</td>
<td>14%</td>
<td>14%</td>
<td>9%</td>
<td>50%</td>
</tr>
<tr>
<td>Tigrinya (Tigrigna)</td>
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<td>6%</td>
<td>11%</td>
<td>14%</td>
<td>11%</td>
<td>11%</td>
<td>5%</td>
<td>50%</td>
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<tr>
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<td>10%</td>
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<td>15%</td>
<td>14%</td>
<td>9%</td>
<td>3%</td>
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<tr>
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<td>6%</td>
<td>9%</td>
<td>9%</td>
<td>4%</td>
<td>12%</td>
<td>32%</td>
<td>4%</td>
</tr>
</tbody>
</table>

Through the study, Root identified the top 10 languages spoken in Aurora:

1. Spanish
2. Korean
3. Chinese (Mandarin)
4. Vietnamese
5. Amharic
6. Tigrinya
7. Nepalese
8. Burmese
9. Russian
10. French

While most city departments encounter LEP residents during the course of business, the study found that Aurora Police Department, Aurora Fire Department, and the city’s water department were those in most need of reliable and consistent language access services.

Based on the findings of the study, the Office of International and Immigrant Affairs began working to address the areas in most need of improvement. What resulted is the city’s first comprehensive Language Access Plan, which includes several services and procedures to assist city employees and departments in their work with LEP residents.

The plan includes resources for translations of documents, interpretation at city meetings, and phone interpretation services. Most of the work is scheduled through an online ticketing system, which was developed by the city’s Information Technology Department in coordination with the OIIA. By January 2019, the system was up and running.

The Language Access Plan was in place before the COVID-19 pandemic closed city offices in the spring of 2020, and played an integral part in the city’s dissemination of information about state and city orders to LEP residents. In fact, many COVID-19 graphics created for Aurora’s LEP communities were also shared by other cities via social media.
Provision of the Language Assistance Services

Aurora provides language assistance services for the top 10 designated languages in the city. Services include the translation of documents, interpretation during city government meetings, and phone interpretation services.

Interpretation

Aurora currently works with five vendors that provide interpretation services for Spanish, Korean, Amharic, Mandarin and Vietnamese, as well as American Sign Language. Services of these vendors can be utilized for public hearings, community meetings, or other similar city activities or meetings. Please make requests for interpretation services 3 days before services are needed. The city sends out an RFP annually to identify the best qualified local vendors.

Document Translation

Translation of city documents is provided via the Language Assistance ticketing system. Employees and city departments can request document translation using the link on the next page. **Please allow 5 days for the work to be complete, depending on the length of the document.**

- To make best use of city resources, the OIIA asks that these services be reserved for documents that will be used with or by 50 or more residents.
- Use the link on the next page to access documents that have been translated.
- Document translation will prioritize the top 5 languages in the city based on the request. Documents that are related to public safety, emergencies, and/or health and safety will be translated in the top 10 languages in the city.

Second Language Program

The city of Aurora’s original Second Language Program has been concluded, and a restructured program has been implemented. To restructure the program, the Transition Team, with Human Resources as the lead, assisted all departments with an assessment, to identify current positions within the city that require or should require a second language skill. With the positions requiring a second language skill identified, HR invites eligible employees to submit an application for consideration. Ultimately, the certification pay for the language skill will be tied to the position, not to the employee. The application requires the employee and direct supervisor to agree to all the terms and conditions of the program:

- Front-line employee
- Availability to assist when called upon
- Occasional request to attend a meeting or translate a one-page document.

A third-party is contracted by OIIA to conduct a skills assessment (test) on each application. This includes interpretation and translation of a second language. When a needed position is identified and an employee is accepted into the program, they will receive Payroll Certification Pay. This will alleviate the need for stipends to be issued twice a year. HR will identify cert pay eligible positions and recruit the staff. OIIA will coordinate skills assessment test and manage the Restructured Second Language Program as part of Aurora Language Access Plan.
Meetings

The City of Aurora provides in-person Spanish interpretation services at the beginning of city council meetings during the PUBLIC INVITED TO BE HEARD (non-agenda related issues only) time. Those in need of an interpreter in other languages, please contact the Office of International and Immigrant Affairs at 303.739.7521 by the FRIDAY PRECEDING the Monday meeting. (Si necesita un interprete, comuníquese con la Oficina de Asuntos Internacionales y de Inmigración al 303.7521 el Viernes anterior a la reunión del Lunes).

Phone Interpretation

Aurora has contracted with Voiance International Line for interpretation and use of this service is suggested for one-on-one interactions when a three-way phone conversation with a human interpreter is needed. Voiance offers interpretation in 150 languages. To access the Voiance International Line, visit the link on the previous page or see the flyers on following pages.

Citywide LAP Language Assistance Webpage

Welcome to Citywide LAP Language Assistance

Aurora has a richly diverse and international community. In order to meet the communication needs of our population, the city is enhancing and consolidating its translation and interpretation services to provide meaningful and quality language services for Aurora’s residents. The Office of International and Immigrant Affairs (OIIA) will manage the Language Access Plan and coordinate language services including American Sign Language. Request for these services by either the public or city staff will be centralized through OIIA.

- Interpretation request for meeting or event needs to be submitted 3 business days in advance
- Translation will be delivered in 5 business days
- ASL (American Sign Language) assistance is available
- All requests will be reviewed
- Have questions? Email Language@AuroraGov.org

To request assistance with interpretation and/or document translation, as detailed on the previous page, visit:

https://auroragov.sharepoint.com/teams/LanguageServicesResources/SitePages/Home.aspx
Record Keeping, Feedback, & Evaluation

At the end of each calendar year, the OIIA reviews each aspect of the plan, including looking at the number of requests for assistance that have been received and vendor performance based on feedback from city employees.

All feedback referencing the Language Access Plan should be sent to language@auroragov.org
Complaints should be sent to OfficeofDEI@auroragov.org The City will investigate the complaint to determine if a violation of this policy has occurred. Following such an investigation, the City will make a determination regarding the complaint, and if necessary, take corrective action.

To learn more about the Language Access Plan, call ext. 37521 or email language@auroragov.org
The following pages provide additional resources or information about vendors and the city’s Second Language Program. Employees who would like to read more about the assessment of the city’s Language Access Plan can find the results of the assessment at www.auroragov.org/city_hall/international_immigrant_affairs.

Resources

Using over-the-phone interpreting service is

Easy to use  Consistent in quality
Fast

Accessing a Voiance interpreter in seconds is easy as 1-2-3.

Using any telephone, dial 1.866.998.0338. When prompted, enter the city account number: 23987

Then enter your department 4-digit: ________
Select “1” for Spanish or “0” for all others.

Provide interpreter with a brief explanation of the call.

For an effective interpretation, use short but complete phrases, avoid jargon and allow interpreter to interact with the resident and to clarify linguistic/cultural issues.
ACCESSING AN INTERPRETER

Using any telephone, dial **1.866.998.0338.** When prompted, enter the city account number: **23987**

Then enter your 4-digit PIN: __________

Select “1” for Spanish or “0” for all other languages.

Select whether you would like to add an additional person to the call. When the interpreter comes on the line, give the interpreter a brief explanation of the call.

**Pin Code for Each Department**

* Neighborhood Services - 7034
* Aurora Water - 9427
* Library and Cultural Services - 5852
* Park, Recreation and Open Space - 2472
* Public Works - 8066
* Management Support - 1628
  - City Council’s office
  - City Manager’s office
  - City Clerk’s Office
  - Facilities

* Communications - 4943
* Finance - 1337
* Office of International and Immigrant Affairs - 5424
* Office of Development Assistance - 1286
* Planning and Development Services - 7248
* Human Resources - 9205
* Homelessness Program - 3946
* Information Technology - 9874
* AFD - 6991
* City Attorney - 2303
* Civil Service Commission - 6123

**LANGUAGE LIST**

Voicist offers hundreds of languages but here are some of the most popular spoken in Aurora, Colorado. To expedite the process, you can enter the 3-digit language code when prompted. Otherwise, select 1 for Spanish and 0 for all the other languages.

Amharic **027**  
Arabic **090**  
Burmese **042**  
Ethiopian **275**  
Farsi **107**

French **058**  
Hindi **082**  
Karen **369**  
Korean **041**  
Mandarin **035**

Nepali **081**  
Russian **078**  
Spanish **060**  
Somali **142**  
Vietnamese **049**

If you need additional help, call **303.739.7521.**
<table>
<thead>
<tr>
<th>Department</th>
<th>Division</th>
<th>Job title</th>
</tr>
</thead>
<tbody>
<tr>
<td>Communications</td>
<td>Access Aurora</td>
<td>Administrative Specialist</td>
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<td>Tax &amp; Licensing</td>
<td>Revenue Agent</td>
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<td>Licensing Officer</td>
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<td>Paramedic</td>
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<td>Firefighter</td>
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<tr>
<td>Fire</td>
<td>Prevention</td>
<td>Inspector</td>
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<tr>
<td>Library &amp; Cultural</td>
<td>Library</td>
<td>Library Assistant/Clerk</td>
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<td>Librarian</td>
</tr>
<tr>
<td>Library &amp; Cultural</td>
<td>Library</td>
<td>Library Supervisor</td>
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<td>Library &amp; Cultural</td>
<td></td>
<td>Manager of Community Relations</td>
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<td>Housing and Community Services</td>
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<td>Housing and Community Services</td>
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<td>Animal Care Officer</td>
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<td>Traffic</td>
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<td>Park Ranger</td>
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<td>Inspection</td>
<td>Construction Inspector</td>
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<td>Building Compliance</td>
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