



**POLICE DEPARTMENT**

**LANGUAGE ACCESS SERVICES**

**OPERATIONAL PROCEDURE #434**

Responsible Executive:  
Chief of Police  
Responsible Office:  
Vice President for Public Safety  
Approved by:  
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Issued: 07/25/2024  
Revised: N/A

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**Policy Statement**

It is the policy of the Johns Hopkins Police Department (JHPD) to take all reasonable steps necessary to ensure timely and meaningful access to law enforcement programs, services, and activities, regardless of national origin or primary language. When performing law enforcement functions, JHPD officers shall provide language assistance to limited English proficient (LEP) persons whenever such assistance is requested or required. Such assistance shall be provided free of charge.

**Who Is Governed by This Policy**

All personnel, including sworn, nonsworn, and contractual or voluntary persons in service with the JHPD, are governed by this Directive.

**Purpose**

The purpose of this Directive is to establish language access procedures for JHPD members to

follow when encountering LEP persons whose primary language is not English and who have a limited ability to read, write, speak, or understand English. Guidelines for interactions with persons who are deaf or hard of hearing are addressed in JHPD Directive #435, Communicating With Persons Who Are Hearing Impaired.

## Definitions

<b>Interpreting/ Interpretation:</b>	The act of listening to a communication in one language (source language) and orally converting it to another language (target language) while retaining the same meaning.
<b>Language Line:</b>	A service through which JHPD members can access telephone interpreters 24/7 in 200+ languages (and video remote interpreters for American Sign Language). JHPD members can access the Language Line via the application on their JHPD cell phones or by placing a call to the Language Line.
<b>Limited English Proficient (LEP) Person:</b>	A person whose primary language is not English and who has a limited ability to read, write, speak, or understand English. LEP persons may be competent in English in certain types of communication (e.g., speaking or understanding) but still be LEP for other forms of communication (e.g., reading or writing). LEP designations can also be specific to context, meaning that a person may have adequate English ability to function in one setting but not in others.
<b>Member:</b>	All members of the JHPD, including employees, officers, and volunteers, unless the term is otherwise qualified (e.g., member of the public, member of the Baltimore Police Department, etc.).
<b>Officer:</b>	All sworn police officers, at any rank, as defined by MD Code, Public Safety, § 3-201, in service with the JHPD.
<b>Primary Language:</b>	The language in which a person most effectively communicates. JHPD members should note that many languages have regional variations (e.g., Puerto Rican vs. Honduran Spanish).
<b>Translation:</b>	The conversion of text from one language (source language) into an equivalent text in another language (target language) while retaining the same meaning.

## Policy

The JHPD will reasonably ensure that LEP persons receive meaningful access to its law enforcement services and activities, while not demanding undue strain on JHPD members. The JHPD does not discriminate against or deny anyone access to services, rights, or activities due to their national origin or any other protected personal characteristics. See JHPD Directive #106, Fair & Impartial Policing.

## Core Principles

- I. **Compliance With Law:** Title VI of the Civil Rights Act of 1964; MD Code, State Government, § 10-1103; and the Safe Streets Act of 1968 require recipients of federal

financial assistance to provide meaningful language access. More importantly, the JHPD recognizes the importance of effective communication between its members and the diverse communities it serves.

- II. Effective Service Provision:** Language barriers impede the effective delivery of law enforcement services in a variety of ways. Ineffective communication with LEP victims, witnesses, and suspects creates investigative and evidentiary challenges and prevents LEP persons from fully understanding important rights, obligations, and services and even jeopardizes safety.

## Procedures

### I. General

- A. The JHPD will make every reasonable effort to provide meaningful and timely assistance to LEP persons through a variety of methods, including language identification cards, translated forms and documents, and language interpreting. Language access will be provided at no cost.
- B. When it is apparent in police-related matters that effective communication is not possible due to a language barrier, JHPD members shall take reasonable steps to provide language access in the LEP person's primary language.
- JHPD members who interact with LEP persons will inform them that language access services are available free of charge and that the JHPD will provide them with this service.
  - As a best practice, JHPD members should ask a person in which language they prefer to communicate with the JHPD member.
  - The JHPD member shall not attempt to struggle through an encounter in English with an LEP person when that person is unable to express themselves in English, or if they request language assistance, unless presented with exigent circumstances.
  - JHPD members shall not tell any LEP person that they must learn English to use police services or that they must provide their own interpreter.
- C. It is important for JHPD officers to effectively communicate the reason for a law enforcement action or contact, the need for information, and the significance or consequences of enforcement actions they intend to take. For example, a JHPD officer shall not request consent to search if the JHPD officer cannot communicate with an LEP person.

### II. Identification of Primary Language

- A. If an LEP person is unable to communicate what their primary language is, the JHPD member shall attempt to identify the person's primary language through one of these methods:
- Opening the Language Line application on their JHPD cell phone (the Insight app) and scrolling the list of languages for the person to point to their primary language,
  - Calling the Language Line by choosing in the mobile app the language that they believe may be correct, after which the Language Line interpreter can assist the JHPD member in identifying the person's language, or
  - Asking the person to point to their language using either Appendix A of this Directive or the Language ID Cards posted in the JHPD's public facilities.
- B. The JHPD shall have Language ID Cards posted in all public reception areas of police buildings to facilitate the public's access to language services and to communicate that all members of the public shall be served, free of charge, in their primary language as needed.

### **III. Use of Interpreters (for Verbal Communication)**

- A. **Telephone Interpreters (Language Line)**
- The JHPD's primary method for providing language accessibility for verbal communications between JHPD members and LEP persons is through its approved telephone interpreter service. The JHPD contracts with Language Line Solutions ("Language Line") to provide telephone interpreter or video remote services in over 200 languages. Language Line interpreters are available by phone on a 24/7 basis, 365 days per year.
  - JHPD members shall access Language Line services by one of the following methods:
    - Navigating to the Language Line app on their JHPD cell phone (the app is called Insight, and the icon says "Interpreters"), or
    - Calling the JHPD's account access number.
  - Once the JHPD member is connected to a Language Line interpreter, they shall:
    - Explain the situation to the operator (e.g., that the member is a police officer responding to a scene and is trying to understand someone on scene who is on speakerphone with them).
    - Always speak in the first person (e.g., JHPD members shall state, "My name is Officer Jones").

- Once the exchange with the LEP person has begun, the member shall speak directly to the person and not to the interpreter (e.g., ask, “What did you see happen?” instead of saying, “Ask her what she saw happen”).
- Speak in one or two sentences at a time, pausing to give the interpreter enough time to interpret. JHPD members should avoid interrupting the interpretation.
- Not have side conversations with the interpreter.
- Be clear and concise and use their normal volume and tone.
- Attempt to verify with the LEP person that they understand what was said.

**B. On-Site/In-Person Professional Interpreters**

- There are certain circumstances where it would be advisable for JHPD members to obtain the assistance of a professional on-site (in-person) interpreter. These instances may include circumstances requiring more important, lengthy, and complex communications, such as formal witness and victim interviews or an interrogation of a person suspected of a crime.
- Formal crime victim interviews and custodial interrogations of a person suspected of a crime potentially involve statements with evidentiary value, upon which a person may be impeached in court. As such, accuracy is a priority. Moreover, a failure to protect the rights of LEP persons during arrests and custodial interrogations presents risks to the integrity of the process. JHPD members must recognize that miscommunication during custodial interrogations may have a substantial impact on the evidence presented in any related criminal prosecution. Therefore, it is strongly preferred that for any custodial interrogation or taking of a formal statement where the suspect’s or witness’s legal rights could be adversely impacted, a professional on-site interpreter is used. All custodial interrogations of LEP persons shall be recorded unless exigent circumstances exist. See JHPD Directive #461, Custodial Interrogations.
  - NOTE: In-person interpreters are better equipped to take in more contextual information—such as the person’s body language, posture, and nonverbal demeanor—that may help them better interpret the meaning of the person’s words and more accurately convey the person’s message.
- When the JHPD officer is planning to conduct a formal victim or witness interview or a custodial interrogation, or if the JHPD officer otherwise believes that the use of an in-person interpreter would be in the best interest of the JHPD and the integrity of the investigation, the JHPD officer shall consult their supervisor for approval to request

an in-person professional interpreter from the JHPD's approved vendor.

- If the supervisor approves, either the supervisor or the member shall contact the JHPD's approved vendor for an in-person interpreter.
- In addition, Miranda warnings shall be provided to a suspect or witness in their primary language. It is strongly recommended that an in-person interpreter assists with the provision of Miranda warnings to ensure the person understands their rights fully.
  - If Miranda warnings have been translated into the person's primary language, the JHPD officer will use the translated Miranda form for the person to sign.
  - In the case of a language for which forms have not been translated and in the case of illiteracy, forms will be read to the suspect or witness in their primary language using either an in-person interpreter or a telephone interpreter. When a form is read to the suspect or witness in their primary language, that oral communication will be recorded.

#### **C. Language-Skilled Bilingual Members**

- Language-skilled bilingual members are sworn and nonsworn JHPD members who can communicate in a language other than English. The JHPD encourages these employees to speak their non-English language during their work when presented with the opportunity.
- Language-skilled bilingual members may communicate with members of the public in their non-English language if they believe that their level of language proficiency is sufficient to accurately communicate given the circumstances of the interaction. At any time, if the JHPD member determines that their proficiency is insufficient to properly communicate with the LEP person, they shall use the Language Line or an in-person interpreter.
- Some factors language-skilled bilingual members should consider when determining whether to conduct policework in the foreign language include whether the LEP person is in police custody, the potential severity of the outcome of the interaction, and the exigency of the situation. For example, a language-skilled bilingual member should not conduct formal witness and crime victim interviews, nor should they conduct custodial interrogations.

#### **D. Use of Family, Friends, or Bystanders**

- Using an LEP person's family or friends or asking bystanders to interpret can cause a breach of confidentiality, a conflict of interest, or inadequate interpreting.

- Therefore, absent exigent circumstances, JHPD members shall only use family, friends, or bystanders to interpret for very informal, nonconfrontational exchanges and only to obtain basic information. It may be acceptable for a member of the public to interpret, for example, if it will expedite the delivery of police services without adversely impacting the quality of those services. In making this determination, the JHPD member shall consider the following factors:
  - Nature and importance of the police services being provided,
  - Apparent linguistic capacity of the interpreter, and
  - Apparent impartiality of the interpreter.
- JHPD officers are prohibited from using an LEP person's family or friends to interpret for domestic violence situations, unless exigency exists (see subpoints below), since friends or family may have biases that impact how they convey the message, they may not interpret accurately, or it may put the victim at greater risk.
  - For domestic violence situations requiring urgent communication due to someone's safety being at immediate risk or the need to obtain descriptive information about a fleeing suspect, a family member may be temporarily used as an interpreter to stabilize the situation. Once the situation is stabilized, the JHPD officer shall call the Language Line to verify the details of the incident and proceed with their casework.
- The suspect of any type of incident, including in domestic violence situations, shall not be used as an interpreter.
- JHPD members shall not use children as interpreters for any kind of police incident unless there exists an exigency and no other options are available. Since JHPD members have access to Language Line interpreters 24/7, it should be extremely rare that this circumstance occurs. Children may lack the cognitive ability, vocabulary, or impartiality needed to convey meaning effectively.

#### **E. LEP Persons With Special Circumstances**

- JHPD members may encounter LEP persons who require additional accommodations, have specific needs beyond language challenges, or belong to a historically underrepresented group. In such cases, the member should be aware of the potential for miscommunication and the need for added support and should proceed as follows:
  - If the communication need is immediate, the member shall contact the Language Line to communicate with the person. If either the person or the interpreter seems to be miscommunicating or they do not seem to be understanding

each other, the member shall call the Language Line back to attempt the communication using another interpreter.

- Where there is more time, the member should request an in-person interpreter and should request that, if possible, the vendor assigns an interpreter with experience or expertise working with persons with the same circumstances or from the same group or demographic.
- Regardless of which type of interpreter is being used for such interactions, the member is encouraged to seek additional resources or supports—for example, the Behavioral Health Crisis Support Team, an advocate, or an agency with expertise in serving the historically underrepresented group—to assist the JHPD member and the person in navigating the interaction and to lend their knowledge where possible.

#### **IV. Document Translation**

- A.** The JHPD contracts with an outside vendor to translate vital documents (including forms where a person waives a right and important public information) into the most needed languages for the LEP populations that the JHPD serves.
- B.** The Commander of the JHPD's Patrol Section serves as the central hub for document translation requests. Any requests for documents to be translated shall be made to the Commander, via the requesting JHPD member's area command, for approval. Such requests shall include the Incident Number for the matter to which the document request relates and the reason for the translation request.
- C.** Upon receiving the translated document, the Patrol Commander will maintain an electronic copy and will send the electronic copy of the document to the requestor's chain of command.
- D.** Each JHPD division, unit, or office shall have electronic access to translated written forms and documents for use with LEP persons. These documents are printable.
- E.** The JHPD shall translate (and transcribe, when applicable) into English recordings, evidence, and documents submitted by LEP persons when such evidence is necessary to continue an investigation or prosecution of a criminal case or a JHPD administrative investigation. This translation shall be completed by the JHPD's translation vendor.
- F.** The JHPD member in need of the language service shall submit their request to the Patrol Commander and shall indicate any deadlines by which they require the translation. In those investigations involving an arrest, the



investigator is authorized to seek the assistance of the State Attorney's Office for any translation services that the SAO may be able to provide.

## **V. Reporting**

- A. Whenever an Incident Report is prepared regarding an incident involving an LEP person, the report shall identify the primary language spoken by the LEP person, the method of language access provided (telephone interpreter, professional on-site interpreter, language-skilled bilingual member, etc.), interpreter contact information and ID number (in the case of telephone interpreters), and any additional applicable details about the language service provided.
- B. Where a language-skilled bilingual member communicated with the LEP person in a non-English language, that JHPD member shall specify their level of proficiency in that language (native speaker of the language, years of schooling in the language, etc.)
- C. Wherever applicable, JHPD members shall use translated JHPD forms available in the LEP person's language. In instances of illiteracy or where there is not a translated version of the form available, members shall do the following:
- Read the form in English and have an interpreter interpret it into the non-English language to ensure that the person understands the information or the form that they are signing.
  - If an in-person interpreter is present, that interpreter can instead read the English document aloud to the LEP person in their non-English language.
  - Translation websites or applications (e.g., Google Translate, among many others) shall not be used to translate documents containing vital information, nor those where a person is waiving a right or signing for comprehension of their rights. This is because their accuracy is inconsistent, and their use can compromise a person's lawfully protected rights. Similarly, websites or applications that translate spoken words into another language shall not be used when the message being transmitted contains vital information or a discussion of waiver or comprehension of a person's rights.
- D. Whenever a translated form is used or an English form is conveyed to an LEP person through an interpreter, the JHPD member shall write in the Incident Report either that the translated form was used or that the English form was communicated via interpreter, as applicable.

## **VI. Notification of Available Language Services**

- A. Each JHPD division, unit, or office with direct public access shall display signs in common foreign languages encountered at Johns Hopkins explaining that language services are available free of charge to LEP persons. Signs shall be displayed at public entrances and on the JHPD’s website.
- B. The JHPD shall ensure that any area used by detainees has posted the procedures for gaining access to medical services in all common languages encountered at Johns Hopkins.

**VII. Complaints**

- A. Any Spanish-speaking LEP person who wishes to file a complaint with the JHPD shall be informed that translated complaint forms are available in Spanish, and those forms shall be provided. For LEP persons who speak other languages, complaints shall be accepted by the JHPD using an interpreter to assist with ensuring that the person’s complaint is accurately and fully captured.
- B. For JHPD complaints with LEP complainants, any written notice required to be sent to the complainant, including the written notice of case disposition, shall be translated into that person’s primary language.

**VIII. Training**

- A. The Public Safety Training Section will provide periodic training to all JHPD personnel on its language access procedures, including how to access telephonic interpreters, on-site professional interpreters, and translated documents. The Public Safety Training Section shall conduct such training for new recruits, during annual police officer and supervisor in-service training, and through online training for officers at least every two years.

**Policy Enforcement**

<b>Enforcement</b>	JHPD managers and supervisors are responsible for enforcing this Directive.
<b>Reporting Violations</b>	Suspected violations of this Directive should be reported to the Public Safety Accountability Unit.

## Related Resources

<p><b>University Policies and Documents</b></p> <p>Conduct &amp; Responsibility #106, Fair &amp; Impartial Policing</p> <p>Operational Procedure #435, Communicating With Persons Who Are Hearing Impaired</p> <p>Operational Procedure #461, Custodial Interrogations</p> <p>Johns Hopkins Medicine Policy PASP001, Interpretation and Translation Services: Patient Language and Communication Needs</p> <p>Johns Hopkins Medicine Language Services Resource Webpage:  <a href="https://intranet.insidehopkinsmedicine.org/jhm-language-services/index.html">https://intranet.insidehopkinsmedicine.org/jhm-language-services/index.html</a></p>
<p><b>External Documentation</b></p> <p>Baltimore Police Department Policy 1735, Language Access Services for Limited English Proficient (LEP) Persons</p> <p>New Orleans Police Department Chapter 55.4, Limited English Proficiency Services</p> <p>San Francisco Police Department General Order 5.20 Language Access Services for Limited English Proficient (LEP) Persons</p> <p>University of Maryland Baltimore Police Department Policy 331, Limited English Proficiency Services</p>
<p><b>Police Department Forms and Systems</b></p>

## Contacts

Subject Matter	Office Name	Telephone Number	Email/Web Address
Policy Clarification and Interpretation	Policy Management	(667)306-8618	<a href="mailto:jhpdpolicyinquiry@jh.edu">jhpdpolicyinquiry@jh.edu</a>

## Appendix A

### I Speak Poster

# I SPEAK...

Ask your patients to point to the language they speak.

Amharic	አማርኛ እናገራለሁ	Krubassa	Me pot Bassa
Arabic	أنا اتحدث العربية	Chinese	我讲普通话
ASL		Nepalese	म नेपाली बोल्छु
Bengali	আমি বাংলায় কথা বলি	Farsi	من فارسی صحبت می‌کنم
Burmese	မြန်မာစကား ပြောတတ်ပါတယ်	Polish	Mówię po Polsku
Cantonese	我會說廣東話	Portuguese	Eu falo Português
French	Je parle français	Punjabi	ਮੈਂ ਪੰਜਾਬੀ ਬੋਲਦਾ ਹਾਂ
Haitian Creole	Mwen pale Kreyòl Ayisyen	Romanian	Vorbesc limba română
German	Ich spreche Deutsch	Russian	Я говорю по-русски
Greek	Μιλάω Ελληνικά	Spanish	Yo hablo español
Gujarati	હું ગુજરાતી બોલું છું	Swahili	ninazungumza Kiswahili
Hebrew	אני מדברת עברית	Tagalog	Nagsasalita ako ng tagalog
Hindi	मैं हिंदी बोलता हूँ	Thai	ฉันพูดภาษาไทย
Igbo	Ana m asu igbo	Tigrinya	እነ ትግርኛ ይዛረብ ኢየ
Italian	Parlo italiano	Urdu	میری زبان اردو ہے
Japanese	私は日本語を話します	Vietnamese	Tôi nói Tiếng Việt
Korean	나는 한국어를 말한다	Yiddish	איך רעד אידיש
		Yoruba	Mó gbọ̀ Yòrùbá

JH1216679 Rev. 06/2021



JOHNS HOPKINS MEDICINE  
**LANGUAGE SERVICES**

**410-614-4685**

#### SERVICES WE OFFER

- Foreign Language Interpretation Services
- Sign Language Interpretation
- Document Translation Services
- Qualified Bilingual Services

