



# HUNTSVILLE UTILITIES POLICY

<b>Revision Approval Date:</b> Gas & Waterworks Board-4/27/2021 Electric Board- 4/26/2021	<b>Date Posted: 4/30/2021</b>	<b>Implementation Date: 5/1/2021</b>
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**Policy #:** CC-9-02

**Policy:** Limited English Proficiency

**Purpose:** Huntsville Utilities (HU) has developed this Limited English Proficiency (LEP) Plan to identify reasonable steps for providing language assistance to persons with LEP who wish to access services provided.

The plan has been prepared in accordance with Title VI of the Civil rights Act of 1964, U.S.C. 2000d, et seq., and Executive Order 13166 and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

This policy outlines how to identify communities or groups who may need language assistance, the ways in which assistance may be provided, staff training that may be required and how to notify LEP persons that assistance is available. HU considers the following factors in the development of this policy:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter HU for utility service.
2. The nature and importance of programs, activities or services provided by HU to the LEP population.
3. The resources available to HU and overall cost to provide LEP assistance.

### Meaningful Access Analysis

1. Using the most recent census data, HU analyzes the number or proportion of LEP persons in the service area who may be served or are likely to encounter HU for utility service, and determines the appropriate languages for translating. While driven by percentages, this decision may be based on other activities in the area, such as a larger than normal increase in the number of LEP population that requires services.
2. HU provides water, gas and electric services to areas in Madison County and parts of Limestone and Marshall County, AL. All residents/businesses within our service territory use our services including those that have LEP.
3. The main resource utilized is an interpretation service available as an option, over the telephone, for customers needing assistance. HU also translates necessary documents and the requirements for service.



## Limited English Proficiency

### Language Assistance Measures

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be an LEP person and may be entitled to language assistance with respect to HU services. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language. HU will normally utilize interpretation services since the primary contact will be during the application for services.

HU utilizes the interpretation services based on the need expressed by the individual. HU utilizes *Language Identification Flashcards* as developed by the U.S. Department of Commerce, Economics and Statistics Administration, U.S. Census Bureau. These flashcards are available at the front desk of our lobbies in the two customer locations and a notice is posted in English and Spanish at each location of their availability.

1. Formal Interpreters - HU employs telephone interpretation services as the main source of formal interpreters to assist customers with application for service.
2. Informal Interpreters - Informal interpreters may include the family members, friends, legal guardians, service representatives or advocates of the LEP customer. HU staff will determine whether it is appropriate to rely on informal interpreters, depending upon the circumstances and subject matter of the communication. However, in many circumstances, informal interpreters, especially children, are not competent to provide quality and accurate interpretations. There may be issues of confidentiality, competency or conflict of interest. These informal interpreters will be used on a case by case basis. An LEP person may use an informal interpreter of his or her own choosing and at their expense, either in place or as a supplement to the free telephone translation services HU offers.
3. Outside Resources - Outside resources may include community volunteers and may be used at public or informal meetings or events.

### Translation of Documents

HU application requirements are available in Spanish. HU translates other customer service and marketing related documents into Spanish as well. For example, each month a bill insert is distributed with information about services offered by HU, this document is translated and made available on our website. The following is a list of documents that will be translated into a second language based on the most recent census data at this time:

- Signs at Application Desk to Sign In, Pay bill, Phone Numbers
- Customer Service Programs
- Identification Documents Required for Application
- Eligibility Requirements for Service
- Utility Assistance Agencies
- Payment Envelope
- Rates
- Customer Service Fees



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- Energy Saving Tips
- Door Hangers
- Heating/Cooling Degree Day Information
- Any Health and Safety Items that are distributed in Monthly Bill Inserts
- Monthly Bill Inserts

HU takes the measures outlined above and may take additional measures as needed.

### **Staffing Training**

To ensure all employees who may have contact with LEP individuals are properly trained, HU will provide periodic training on this policy and any related procedures. Those who may have contact with LEP individuals should receive refresher training at least once every two years. Records of all LEP training must be forwarded to Human Resources and retained in accordance with the established records retention schedule.

### **Monitoring and Updating**

This plan is designed to be flexible and should be viewed as work in progress. As such, it is important to consider whether new document and services need to be made accessible for LEP persons. HU monitors changes in demographics and types of services and updates the LEP Plan as necessary during annual reviews.

**Original Issue Date:** 2/15/13 (Former 9-02)

**Revision/Review Dates:** 2/28/23 (N/C)