Plain Language Frequently Asked Questions (FAQs)

Homeland Security

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Executive Summary

The Office of Emergency Communications (OEC) supports the Secretary of the Department of Homeland Security (DHS) in developing, implementing, and coordinating interoperable and operable communications for the emergency response community at all levels of government.

A key component of interoperable communications is the ability to communicate using a common language. In December 2006, the National Incident Management System (NIMS) issued an alert stating: "it is required that plain language be used for multi-agency, multi-jurisdiction and multi-discipline events, such as major disasters and exercises…while the NIMS Integration Center does not require plain language for internal operations, it strongly encourages it, as it is important to practice everyday terminology and procedures that will need to be used in emergency incidents and disasters."[1] On September 10, 2009 NIMS issued another alert, replacing the one issued in 2006, which states, "the use of plain language in emergency response is a matter of public safety, especially the safety of first responders and those affected by the incident."[2]

At the June 2007 SAFECOM Emergency Response Council (ERC) meeting, meeting participants discussed the use of plain language as a critical piece of the interoperability puzzle and noted that instituting "plain language and common terminology" and actively engaging public safety organizations on this topic are important steps to addressing public safety communications interoperability.[3] To support these efforts, a Practitioner Action Team (PAT) was convened. At the December 2007 ERC meeting the PAT agreed that the following phrase could be used to help promote the plain language effort: "we support radio practices that minimize or eliminate coded substitutions for English." Since that time several national public safety-related organizations have adopted the phrase. They include the International Association of Fire Chiefs (IAFC), the National Sheriffs' Association (NSA), and the National Public Safety Telecommunications Council (NPSTC), to name a few. In addition, the PAT supported development of the *Plain Language Guide: Making the Transition from 10 Codes to Plain Language.* The guide was released in July 2008 and is available for download at http://www.safecomprogram.gov/SAFECOM/library/interoperabilitybasics/1371_plainlanguage.htm

Agencies across the country are increasingly adopting plain language. The National Emergency Communications Plan (NECP) and many of the Statewide Communication Interoperability Plans (SCIP) include plain language milestones and initiatives. The case for plain language continues to advance as more and more agencies eliminate or minimize the use of coded language. At the same time, work remains to be done, such as addressing cultural issues, engaging leadership, and communicating about plain language successes. As such, in April 2009, OEC established the Plain Language Working Group (PLWG), comprised of over 40 stakeholders from across the country and representing multiple-disciplines. The purpose of the PLWG was to provide an

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[1] http://www.fema.gov/pdf/emergency/nims/plain_lang.pdf

[2] http://www.fema.gov/pdf/emergency/nims/NIMS_ALERT_06-09.pdf

[3] The SAFECOM ERC is a key resource for the improvement of emergency response communications interoperability and is comprised of representatives from the local, tribal, State, and Federal emergency response and policy maker communities.

update to the Plain Language Guide published in July 2008. Specifically the PLWG was asked to identify additional lessons learned and smart practices related to plain language. The result of the PLWG's efforts is the *Plain Language Frequently Asked Questions (FAQs)* guidance document which should be used as a supplement to the Plain Language Guide published in July 2008.

The OEC and PLWG developed the FAQs to provide additional support to and make the business case for agencies transitioning, or planning to transition to plain language. The FAQs include the results of independent research as well as specific examples of lessons learned and smart practices from stakeholders who have implemented plain language. Links to additional resources are available on the National Interoperability Information eXchange, www.niix.org, under the Plain Language community and are listed at the end of this guide.

OEC and the majority of PLWG members believe that the use of plain language in daily operations enhances the responder's ability to support a mutual aid event. Agencies requiring additional answers or assistance in moving to plain language, or wanting to provide information for this document, may contact OEC at oec@dhs.gov.

Plain Language Frequently Asked Questions (FAQs)

In April 2009 the Office of Emergency Communications (OEC) formed a Plain Language Working Group (PLWG). The PLWG was comprised of over 40 stakeholders from across the Nation representing multiple disciplines. The purpose of the PLWG was to identify smart practices, lessons learned, and guidance related to plain language implementation. The PLWG identified the following Frequently Asked Questions (FAQs) related to plain language implementation.

1. What is plain language?

Plain Language is defined as: communication that can be understood by the intended audience and meets the purpose of the communicator.

For the purpose of the National Incident Management System (NIMS), plain language is designed to eliminate or limit the use of codes and acronyms, as appropriate, during incident response involving more than a single agency. In the context of NIMS, plain language replaces coded substitutions with common terminology and definitions that can be understood by individuals from all responder disciplines and across jurisdictions. NIMS defines common terminology as: normally used words and phrases—avoiding the use of different words/phrases for similar concepts—to ensure consistency and to allow diverse incident management and support organizations to work together across a wide variety of incident management functions and hazard scenarios.[4]

On December 19, 2006, the NIMS Integration Center issued an alert requiring the use of plain language for multi-agency, multi-jurisdiction and multi-discipline events, such as major disasters and exercises. Beginning in Fiscal Year (FY) 2006, Federal preparedness grant funding became contingent on the use of plain language in incidents requiring assistance from responders from other agencies, jurisdictions, and functional disciplines. The September 2009 NIMS Alert reiterated the importance of using plain language for multi-agency response.

Other terms used to describe the use of non-coded language include: common language, plain English and plain talk. While these terms are often used interchangeably, they do not necessarily mean the same thing to everyone. Some stakeholders interpret the terms "plain language", "plain English", and "plain talk" as understood by anyone; and believe the term "common language" to be understood by a smaller, trained audience. For example, a responder using plain language may say "back of the building" and one using common language may say "side charlie."

At present there is no formally defined and broadly accepted list of common terminology. The potential impact of not having standard common terminology is that the language or terms used may be unique to one jurisdiction or discipline and, therefore, may not be common to others outside of that group. As a result, interoperability may not be improved during mutual aid events.

2. Why should my agency implement plain language?

To avoid confusion and misinterpretation among different agencies, to comply with Federal mandates for mutual aid events, and to ensure consistent, uniform training for public safety first

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[4] http://www.fema.gov/pdf/emergency/nims/NIMS_core.pdf

responders.

> *In Independence, Mo., 10-33 was code for traffic backup. In 2005 an officer passed a state trooper who was laying 20 feet away in a ditch, barely alive, shot eight times. When the officer from Independence called dispatch to report what he'd found, this is how the dispatcher relayed that information to the State Highway Patrol: "They have a trooper in the ditch, they are ordering the ambulance, they are also trying to get Life Flight." Instead of using code (e.g. 10-33, which to Missouri Highway Patrol meant traffic backup) dispatch switched to plain English and every state trooper for 50 miles came running. The officer lived, and the suspect was caught in less than an hour.[5]*

There are many who believe plain language is a fundamental concept to ensure public safety interoperability. Alan Caldwell, Senior Adviser, Government Relations, International Association of Fire Chiefs and former chief fire officer, Fairfax County (Virginia) Fire & Rescue Department, notes that, "if you believe in interoperability you believe in plain language."

While the Federal requirement to use plain language is intended to increase interoperability during mutual aid events, there are implications for single agencies as well. For example, a study conducted by a State police agency showed that in stressful situations their officers used both plain language and coded language in the same transmission, causing confusion. They concluded that the organization did not have a true process or standard for communication, and as a result implemented plain language as the standard.[6]

Although NIMS guidance only requires plain language use in mutual aid events, the way responders train and communicate daily has an impact on the way they will communicate in a mutual aid situation. As a result, if responders train using coded language they will likely respond under stress with coded language. In a mutual aid crisis this could result in miscommunication or delayed clear communication that could translate into lives lost. To mitigate this issue, some states, such as Minnesota, plan to hold regional exercises to make sure first responders are habituated to using plain language.[7] "Police officers might have a code that firefighters and EMS don't understand," said Tom Johnson, interoperability program manager for the state of Minnesota. He added that in some situations, the language barrier could be a deadly serious matter. "It could be a matter of life and death if you're looking for supplies or materials and the person who could provide them can't understand [the codes]."[8]

3. Is my agency required to implement plain language? Do we need to implement plain language in order to receive grant funding?

Plain language is required for multi-agency, multi-jurisdiction and multi-discipline events, such as major disasters and exercises. According to the NIMS Alert released by the DHS Federal Emergency Management Agency (FEMA) in 2006 and again in 2009, "beginning FY 2006, federal preparedness grant funding is contingent on the use of plain language in incidents

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[5] Plain Talk Eases Radio Police Radio Codes Off the Air, National Public Radio, October 13, 2009
[6] Common Language Protocol: The Future of Communication for the Louisiana State Police, March 19, 2007

[7] Quest for Interoperability Applies to Talk, Not Just Technology, Congressional Quarterly Homeland Security, September 18, 2009

[8] http://www.npstc.org/documents/CQ_Plain_Language_090918.pdf

requiring assistance from responders from other agencies, jurisdictions, and functional disciplines."[9]

At present there is no requirement at the Federal government level (or known State requirement) that mandates the use of plain language in *daily operations inside of a single discipline*.

The July 2008 National Emergency Communications Plan (NECP), developed with public safety stakeholder input and validation, calls for "national adoption of plain language practices."[10] The NECP does not mandate the use of plain language; however, the plan established the following recommended milestones to encourage emergency response organizations to eliminate the use of coded substitutions:

- Within six months, OEC develops plain language guidance in concert with State and local governments to address the unique needs of agencies/regions and disciplines across the Nation. (Completed January 2009)

    o OEC published the Plain Language Guide to the SAFECOM web site at http://www.safecomprogram.gov/SAFECOM/library/ (search: plain language). The Plain Language Guide outlines an approach for emergency response agencies, localities, and states to replace coded language radio transmissions with plain language.

- Within nine months, the National Integration Center's (NIC) Incident Management Systems Integration Division (IMSID) promotes plain language standards and associated guidance**.** (Completed July 2009)

    o IMSID issued a NIMS Alert on Plain Language, dated July 27, 2009.

- Within 12 months, grant policies for Federal programs that support emergency communications are coordinated, providing incentives for States to include plans to eliminate coded substitutions throughout the Incident Command System (ICS). (Completed July 2009)

    o OEC worked to develop grant language that encouraged the elimination of coded substitutions through a variety of grant programs. OEC released the FY09 SAFECOM Grant Guidance for the Homeland Security Grant Program (HSGP) providing guidance on eliminating coded substitutions. Additionally, OEC and FEMA Grant Programs Directorate (GPD) drafted the FY09 Interoperable Emergency Communications Grant Program (IECGP) Priorities and Guidance Kit that supports providing incentives for States to include plans to eliminate coded substitutions throughout ICS.

- Within 24 months, all Statewide Communications Interoperability Plans (SCIPs) reflect plans to eliminate coded substitutions throughout the ICS, and agencies incorporate the use of existing nationwide interoperability channels into standard operating procedures (SOPs), training, and exercises at the Federal, State, regional, local, and tribal levels. (Due for completion July 2010)

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[9] http://www.fema.gov/pdf/emergency/nims/plain_lang.pdf

[10] http://www.dhs.gov/xlibrary/assets/national_emergency_communications_plan.pdf, page 21

o States are required to report on their progress to eliminate coded substitutions in each annual SCIP implementation report. As required by the IECGP, these reports are due in July 2010.

With regard to grant funding to support a transition to plain language, the IECGP is a potential source of these funds. The IECGP provides governance, planning, training and exercise, and equipment funding to States, Territories, and local and tribal governments to carry out initiatives to improve interoperable emergency communications, including communications in collective response to natural disasters, acts of terrorism, and other man-made disasters.[11] In addition, plain language is referenced in the SAFECOM Guidance for Federal Grant Programs.[12]

4. What type of resistance can one expect when trying to implement plain language?

There are common statements from those who are concerned about transitioning to plain language. Agencies transitioning to plain language should be prepared to address statements such as *"Plain language compromises officer safety." "It takes longer to use plain language phrases than using codes." "Plain language sounds unprofessional."*

Concern has been expressed that plain language sounds unprofessional. David Staton from the Louisiana State Police notes: "plain language usage gets better with practice. At first, responders will say things they wouldn't ordinarily say. They'll say more than they need to. Success will come with training and the opportunity to practice how to use plain language." The Mesa, Arizona Police Department (hereafter referred to as Mesa PD) has been using plain language since September 2008. Kim Clark of Mesa PD, and a member of the PLWG, notes that successfully using plain language requires radio discipline and reinforcement of the importance of brevity through department training. To address resistance, Mesa PD, and others recommend that early in the process agencies should develop training presentations or papers (see examples in the Reference Library of this document) that address the concerns and issues associated with plain language.

An important point to remember is that even after an agency addresses concerns, individuals may continue to resist plain language adoption. Over time, as plain language becomes institutionalized and people stop using codes, responders who initially resisted will likely begin to use plain language. As one person said at an agency where plain language has been in use for decades – "peer pressure eventually takes care of the holdouts."

5. If we implement plain language will non-responders (specifically the "bad guys") know what we are saying? Will we compromise our responder's security and safety? How have others addressed this concern?

An often-cited barrier to moving to plain language is the perception that the use of plain language compromises responder safety. Others believe plain language increases responder safety. Some argue that coded language should be used for security and privacy but it is easy to find code definitions so they are really not secret. Additionally, advances in technology, such as ear buds,

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[11] http://www.fema.gov/government/grant/iecgp/index.shtm

[12] http://www.safecomprogram.gov/SAFECOM/grant/default.htm

provide a mechanism to transmit information to only the responder which helps protect responders.

Pierce County, Washington implemented plain language in the late 1980s. Ed Smith, a member of the PLWG, has been with the Pierce County Sheriff's Department since implementation and when asked if he knew of any situations in the decades since implementing plain language where plain language compromised officer safety he replied "actually, it is safer because (people) are not making a mistake on a code…using clear text (e.g. plain language) results in less transmission errors."

There is a misconception that only the responder community understands codes, however, there are websites and applications that provide listings of codes and translations for jurisdictions across the country. For example, purchasers of police scanners are often provided with a list of local emergency response codes. There is an iPhone application that lists of many of the codes from across the country. iTunes users can access an application called Emergency Radio allowing users to listen to over 1,000 live police, fire, EMS, and other emergency frequencies. There is a built in police and emergency scanner code list that covers hundreds of major cities such as Chicago, Dallas, Los Angeles, and New York, to name a few.

Other agencies who have moved to plain language have addressed the concern about responder safety in multiple ways. For example, the Virginia Interoperability Coordinator's Office plain language protocol maintained four standardized (and two optional) coded language scenarios, known as Signals, to address responder safety concerns. The Louisiana State Police leveraged technology to help address the issue of officer safety by using a special alert tone to indicate "message waiting." This tone was a generic tone that signaled to the officer that there was a special message (wanted felon, for example) that dispatch needed to deliver. At the same time, many agencies have eliminated coded language and signal tones altogether and moved to the use of plain language only.

In addition to fundamentally impacting how people communicate, technology has eliminated many of the transmission challenges that were factors for the need to use coded language in the first place. Responders increasingly use ear buds and cellular telephones for communications, further minimizing the need for coded language. With technological advancements emergency response communications will continue to become more secure and the use of coded language even more obsolete.

6. What are examples of the types of codes agencies have retained?

In situations where agencies have retained coded substitutions, they have, for the most part, addressed the responder safety concern. The following example highlights similarities between two different agencies over a period of 25 years.

Lakewood, Colorado eliminated coded language in the 1970s. They retained eight codes; four of which could be considered as being related to officer safety. When Virginia moved to plain language, four codes were retained and all related to responder safety. While some argue against retaining any codes, agencies recognize that the move to plain language represents a shift in culture and work with their stakeholders to find common ground (such as the compromise to retain a limited number of codes related to responder safety.)

Virginia and Lakewood, Colorado, separated by 1,700 miles, identified two sets of codes 25 years apart yet a quick analysis indicates that the codes show relative alignment with regard to key officer/responder safety concerns. Lakewood, Colorado continues to use plain language

today, with one code added for a total of nine codes. In addition, the meaning of some codes in use today has been slightly modified from the original as noted in the table. The analysis of codes demonstrates that an agency requires relatively few coded language scenarios to address officer/responder safety concerns in the context of moving to plain language.

The table below shows how Virginia and Lakewood, Colorado's codes map to the other.

Lakewood, CO – 1975	Lakewood, CO - 2009	Virginia - 2007	Message Intent?
Stop Transmitting	Emergency – stop transmitting except for emergency traffic	Responder or dispatcher needs to convey sensitive, confidential, or safety information	Wait to transmit
Wanted/Records Check/Wanted Felon/Dangerous/Mentally Unstable	Wanted person or stolen vehicle	Responder is taking or anticipates taking suspect into custody	Caution with Suspect
Urgent	Expedite	Responder needs assistance or back-up followed by a common language indicator such as "urgent" or "non-emergency"	Support Needed
Emergency	Emergency response with red lights and siren	Responder in immediate danger	Emergency

7. Does it take longer (i.e. use more air time) to use plain language rather than codes?

With good radio discipline there is no reason talk time has to increase with plain language.

As Mesa PD planned their transition to plain language they invited those who were skeptical to voice their concerns. A key concern was whether it took more time and used more air space to communicate using plain language. Kim Clark, from the Mesa PD, adopted the philosophy "fight fright with facts" and used real data to respond to people's concerns. For example, the Mesa PD picked busy times of the day, recorded dispatch communication and then performed syllable counts to identify whether plain language took longer than coded language. In cases where plain language communication took longer than coded communication, a working group developed alternate words or phrases to replace the code. Mesa PD's analysis showed that with radio discipline there is no reason talk time has to increase with plain language.

In 1975 the Lakewood, Colorado Public Safety Department released a study titled *Ten Code vs. Clear Speech Communication*.[13] The study's authors compared the use of a 10-code system to

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[13] http://www.911dispatch.com/reference/tencodestudy.pdf

clear speech communication ("clear speech" is referred to as plain language in this document). Test results indicated that clear speech transmissions are more error free than a code system. Further, the test results showed that clear speech messages, using abbreviated sentences, require less transmission time than coded transmissions. **The end result showed that over a 24-hour period, clear speech communication saved two hours and 52.8 minutes over using 10-codes.**

The study also tested to see whether clear speech transmissions were more error free than a code system. **The study concluded that in 42.5 percent of transmissions using coded language there were errors (for example, requests for repeats, procedural mistakes, etc.) In using clear speech communication there were errors in only 7 percent of the transmissions.** As a result of this study, Lakewood, Colorado implemented clear speech (plain language) procedures in January 1975 and continue to use plain language today.

8. What impact do State-specific legal definitions have with regard to plain language usage?

There are differences between States in terms of technical, legal, and criminal law definitions. The issue of differing legal definitions, and the authorities granted by their use, is an operational and mutual aid issue and is not specific to plain language. While it is important to address these issues, it is not the intent of this guidance document to answer the question.

9. Whose support is needed to transition to plain language?

Leadership support is essential to successfully implement plain language.   Multi-disciplinary working groups representing a cross-section of the organization, such as dispatch, can also support the transition.

Senior leadership and first line supervisors within the agency need to be part of the transition. In addition to the formal leadership, it is important to engage the informal leaders and advocates – regardless of position. Informal leaders are present in all organizations. If you can bring these informal leaders on board as advocates, the transition will be easier.

Many agencies that have successfully transitioned to plain language form working groups made up of a cross-section of stakeholders to support development and implementation. Involving staff at all levels and with varying years of experience, as well as engaging dispatchers early on, is a smart practice as their buy-in and ownership will have a broad-based impact. Listening to both advocates and those who are skeptical is important. Those with concerns often identify key issues that have to be addressed as part of the transition. A general rule is those who will be asked to change their way of working need to be engaged in the planning process as people tend to take ownership of what they help create.

10. What are end state options for a plain language implementation project?

Agencies need to determine whether to retain any codes or replace all codes with plain language. In cases where codes are retained, a clear rationale (e.g. responder safety) and definition of each should be defined and agreed upon by all parties.

As the end state is defined, the agency should make sure to clearly communicate about the new policy. A few key points to consider in determining the end state include:

- Review governing directives/policies and assess their impact.
- Identify which regularly used codes are perceived to be critical to officer safety; determine whether a code will be retained, or plain language word or phrase (or radio alert/tone) will replace the code.
- Identify the end state: no codes or signals; limited number of codes/signals or list of plain language phrases to replace coded language.
- Create entirely new codes so responders do not confuse an old code with a new meaning.

When Virginia transitioned to plain language four signal codes were (e.g. signal 1, signal 2, signal 3, signal 4) so responders would not be confused with old codes (e.g. 10-X). In addition, organizations should identify any standard terms and phrases they will use to replace coded language along with the specific phonetic alphabet. Once an organization defines the new end state, the new policy needs to be communicated to those who will be expected to follow the new protocol. Virginia and Louisiana created "visor cards" so responders had a quick reference available as they learned the new standard.

11. What impact does plain language have on Computer Aided Dispatch?

Many entities program their Computer Aided Dispatch (CAD) system to accept only 10-codes as incident markers. Reprogramming of the system to translate existing 10-codes into plain language may be required.

Virginia is an example of a successful transition. The Virginia State Police reprogrammed its CAD system to change the 10-code call types to abbreviations derived from its plain language effort. The CAD system continued to accept 10-code call types for six months after the reprogramming to allow dispatchers to gradually adjust to the change. As part of this effort, the Virginia State Police had to identify and modify all internal system processes that were triggered by the original 10-code call type entries. Finally, the Virginia State Police informed the Virginia Department of Transportation and naval intelligence personnel of their CAD reprogramming, as those agencies also used CAD information.

Additional smart practices include:

- Allow the CAD system to accept both 10-codes and plain language codes for a period of time until the dispatchers are accustomed to the new system.
- Look at all the systems to which the CAD system interfaces to identify other impacts.
- Include a CAD operator on the working group to help identify issues up front.
- Plan the plain language implementation to coincide with CAD upgrades, if possible.

12. What are communications/marketing examples that have helped gain buy-in for plain language?

Communications and marketing efforts should be tailored to meet each agency's culture and size. For example, some agencies create an initiative to engage people in the change effort and others count on strong leadership. Regardless of approach, clear and consistent communication is critical to success.

Mesa PD decided to transition to plain language and created the "Plain Train" campaign to engage people and solicit ideas for implementing plain language. When anyone – peer,

subordinate, or supervisor – observed someone doing a great job using plain language, they would give that person a coin/token. On one side the coin/token read "Riding the Plain Train" and on the other side it said "Challenge Accepted." When an employee accumulated three tokens they redeemed the coins for various rewards.   In addition, Mesa created a "Plain Challenge" that awarded employees for generating creative ideas and solutions. There were over 300 ideas submitted and at least 200 implemented as part of the Plain Train initiative.

Northern Virginia, a region comprised of multiple jurisdictions outside of Washington, DC, developed the video, *Northern Virginia Common Language Protocol: A Standard for Public Safety Radio Communications*. In the video, Fairfax County Police Chief David Rohrer provides a brief overview of the need for plain language to promote interoperability and acknowledges the strong culture and tradition reflected in the use of 10-codes. He goes on to illustrate how the events of September 11, 2001 highlighted the need for a common language to communicate with others and promote real interoperability. Lt. Col. Steve Sellers, also with the Fairfax County police, explains that as with many changes, the true challenge lies not in the technical difficulty but in addressing the fundamental resistance people demonstrate or experience when asked to do something different.

13. How could one stage/phase-in the implementation of plain language? How long does it take?

Some agencies use a phased implementation approach, and others simply announce the date when plain language will officially become policy. To determine their approach, each agency should assess the necessary level of buy-in by senior officials, the size of the organization(s) transitioning, as well as the specific culture of the organization(s) involved.

First, it's important to just get started. Alexandria, Virginia Deputy Police Chief Eddie Reyes (also a member of the PLWG) said, "If we didn't start we never would have moved to plain language." Second, begin with the end in mind. For Mesa PD, Kim Clark's Commander instructed that plain language be implemented in 90 days. They completed the initial implementation in 96 days and continued to train their staff. Third, as necessary, develop a plan that utilizes a phased implementation approach. For example:

- 30 days – conduct a pilot period where people can experiment with plain language and use this time to identify any issues (also reward/acknowledge early adopters).
- 60 days – use this time to reward early adopters and provide affirmation to those who are using plain language as intended.
- 90 days – at this stage encourage people to use plain language and remind them that plain language use is/will be agency policy as of a specific date.
- 120 days – after four months, responders should be proficient with using plain language. If people are still not using plain language at this stage they may need disciplinary action. At some agencies, there is a requirement in a standard operating procedure that, if someone uses a code, dispatch calls a supervisor to advise the officer not to use the code. It is also important to remember that veteran officers who have been using coded language for decades may require additional training and support as they learn to transition to the new plain language policy.

When the Louisiana State Police implemented plain language, they decided they were going to

have a three-phase pilot program. They began implementation in parts of the State that did not have a lot of activity and concluded with the busiest parts of the State: New Orleans and Baton Rouge. They took the following approach:

- Conducted an initial 30-day pilot that worked well. They had good leadership at the local troop level. They borrowed smart practices from Virginia and developed visor cards with suggested phrases to replace 10-codes.
- After the initial 30-day pilot they expanded to the center part of the State with larger troops. This phase went so well in that responders who were not part of the official pilot (and who were part of a different unit) heard the plain language communication on the radio and started using it as well. This was very encouraging as they prepared for the third and final phase.
- The final phase rolled-out plain language in Baton Rouge and New Orleans. Representing a significant change from the first two phases, it was unclear how readily plain language would be adopted. Dave Staton, who played a key role in implementing plain language said he "was really pleased to find out that people went into the implementation with open minds…it was very successful."

Not all agencies use a phased implementation approach. For example, when the Dallas Police Department transitioned to plain language, the Chief issued a memo stating that plain language would become official policy beginning in March 2009. Following are excerpts from an article published on March 29, 2009 on DallasMorningNews.com regarding the Dallas Police Department's transition from coded language to plain language:

> *The Dallas Police Department says it is following a nationwide trend, but some call it the end of an era. Others say the switch is no big deal. Many Dallas police dispatchers already include plain language because it's simple. "It's a no-brainer," Dallas Police Senior Corporal Herb Ebsen said. "It's just common sense. If we start speaking in codes, you have a real chance for a problem or misinterpretation." In a follow-up interview with Senior Corporal Herb Ebsen he told DHS OEC "they had no problem whatsoever implementing plain language."*

The Sheriff's Department in Pierce County, Washington implemented plain language in the 1980s. Their approach was similar to that used by Dallas and simply included a communication from the Chief announcing the date when plain language would become policy, along with the updated policy guidance which included eight retained codes along with the definition.

Regardless of approach, a smart practice is for agencies to determine the date when plain language will become official policy. To meet that date each agency will have to take into account its own unique culture and then determine an appropriate implementation approach.

14. How does one identify and define common terms?

At the time these FAQs were developed there was no broadly recognized or accepted national list of common terminology with definitions available to replace coded substitutions for communications.

Traditionally, the operational details of the ICS have not been encoded in NIMS or National Interagency Incident Management System (NIIMS) prior documents. They have been incorporated in specific ICS documents. For instance, a book entitled "Incident Command

System" published in 1983 includes an appendix, "ICS Clear Text Guide" with 30 common terms and definitions. However, while NIMS does provide common terminology for organizational functions, resource descriptions, and incident facilities there is not currently a list of common terms and definitions as outlined in the 1983 ICS Clear Text Guide.

As agencies move to plain language they can coordinate with the Statewide Interoperability Coordinator (SWIC) and consider relevant Federal guidance. At an agency level, and in the absence of a national list of common terminology, a smart practice used by Mesa PD was to ask staff to make suggestions for words or phrases to replace codes. This helped the organization obtain the buy-in required during implementation.

15. How have agencies addressed the training requirements to transition to plain language?

The most important part of training is to clearly and consistently communicate, through a variety of mechanisms, the agency's new plain language policy.

A smart practice is to get the message out quickly that plain language will be the policy at a set time in the future. Get supervisors and dispatchers on board early and include them in any working groups. Supervisors should be told well ahead of time and, if possible, trained ahead of the general staff.

When Pierce County, Washington implemented plain language decades ago, training was on the job and there was no additional training provided. Other agencies promote a multi-faceted training program where officers and dispatchers get plain language skills in basic training, current employees get it through mandatory in-service training or roll-call (for example), and all employees receive reinforcement through periodic exercises and evaluations. Agencies can deliver training via a variety of mechanisms such as video, online, exercises, and/or written communication (e.g. emails, memos). The Mesa, Arizona PD and agencies in Virginia used all these mechanisms to ensure they properly trained all staff and provided them regular updates and reinforcement. The Dallas Police Department used the web to provide information and training.

16. How does one communicate with other agencies that don't plan on using plain language?

This should not be an issue since NIMS requires the use of plain language in a mutual aid event. FEMA dedicates a website, www.fema.gov/emergency/nims/FAQ.shtm, to answering NIMS related questions. A smart practice is for agencies to take a proactive approach to identify response partners and plan how they will work together to comply with NIMS. This might include multi-agency exercises and establishing mutual aid agreements (such as the Emergency Management Assistance Compact (EMAC)).

17. What are the key things to consider in implementing plain language?

Agencies should customize their plain language implementation approach to best address the needs and concerns of those who will be most impacted, taking into account the agency's culture and readiness for change.

Agencies who have implemented plain language cite the following as key things to consider:

- Convene a working group comprised of people at various levels and in various roles – make sure dispatch is part of the group.
- Engage those who will be impacted by the change.
- Define the end state; determine whether any codes will be retained and develop the plain language policy.
- Identify and formally announce the date when plain language will become official policy.
- Ensure adequate leadership support and communicate early and often about plain language implementation goals and key milestones.
- Listen to and address concerns with facts and share success stories from agencies who have implemented plain language.
- Consider any relevant State or Federal guidance.
- As plain language is implemented make time to capture early lessons learned so adjustments can be made.
- Reassess. For many, adoption of plain language in place of coded substitutions is a massive cultural change so ongoing reviews of implementation need to occur. A recommendation is to assess the status of plain language six months to a year after the completion of the initial effort and make the necessary adjustments to any standard operating procedures. It may be necessary to conduct some additional training.

18. Where can I find additional information and tools related to plain language?

The National Interoperability Information eXchange (NIIX) has an on-line community dedicated to plain language.[14] The community has a library of resources including templates, policy statements, presentations and other information related to plain language implementation. The SAFECOM website also contains links to information related to plain language.[15]

An analysis of 2008 Statewide Communication Interoperability Plans shows that more than half of all States have, or plan to have, initiatives related to plain language. As such, agencies can consult with the Statewide Interoperability Coordinator to potentially align with any State guidance or initiatives related to plain language. [16]

If you have additional questions or advice to lend to this document please contact OEC at oec@dhs.gov.

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[14] www.niix.org

[15] www.safecomprogram.gov/SAFECOM

[16] State refers to States and territories.

Reference Library

The examples contained within the Reference Library have been developed by stakeholders out in the field, not by OEC. As such, in referencing these examples, stakeholders should recognize that inclusion of a document in the Reference Library does not constitute an official endorsement of the document on the part of OEC. These documents serve as a representation of how formal documents are currently utilized by the emergency response community. They are meant to provide you with insight into how your colleagues' previous work can be leveraged in the creation of your own formal documents.

The resources are available for download at the http://niix.org/niix/index.jsp under Plain Language Community. OEC encourages stakeholders to contribute resources to the Plain Language Community reference library.

Resource	Description
Virginia State Interoperability Advisory Group - Cover Letter for Questionnaire No 1	Cover letter to all Sheriffs in Virginia regarding the creation of a Common Language Protocol across the Commonwealth.
Virginia State Interoperability Advisory Group - Cover Letter for Questionnaire No 2	Cover letter to all Fire Chiefs in Virginia regarding the creation of a Common Language Protocol across the Commonwealth.
Virginia State Interoperability Advisory Group - Questionnaire No 1	The Initiative Action Team (IAT) used two statewide questionnaires to collect input from the public safety community. The IAT sent the surveys to police chiefs, fire chiefs, sheriff, EMS supervisors, 911 center supervisors, agencies participating in the Statewide Agencies Radio System (STARS), and university police departments. The first survey identified which organizations were using plain English and which were using 10-codes. The second survey solicited input on specific common language strategies, such as reprogramming computer assisted dispatch CAD systems. The IAT used these surveys to identify which implementation strategies could be reasonably applied on a statewide level.
Virginia State Interoperability Advisory Group - Questionnaire No.2	The Initiative Action Team (IAT) used two statewide questionnaires to collect input from the public safety community. The IAT sent the surveys to police chiefs, fire chiefs, sheriffs, EMS supervisors, 911 center supervisors, agencies participating in the Statewide Agencies Radio System (STARS), and university police departments. The second survey solicited input on specific common language strategies, such as reprogramming computer assisted dispatch CAD systems. The IAT used these surveys to identify which implementation strategies could be reasonably applied on a statewide level.
Louisiana State Police Common Language Visor Card	One pager that provides the phonetic alphabet, four response codes, suggested phrases to replace some commonly used 10 codes, and protocol to transmit

Resource	Description
	sensitive or confidential information.
Northern Virginia Common Language Protocol Visor Sheet	One pager providing common language phrases and definitions, 4 signal code exceptions to plain language, optional signal code transmissions, and use of international phonetic alphabet.
SAFECOM Plain Language Guide Making the Transition from Ten Codes to Plain Language	This brochure helps emergency responders transition from the use of 10-codes to plain language during radio communication. Furthermore, it demonstrates how plain language improves interoperability among agencies, explains the value in using plain language, and documents the effort, resources, and key actions required to implement plain language in a State, region, or agency.
APCO Position on Plain Language	Asserts that plain speech communications over public safety radio systems is preferred over the traditional 10-Codes and dispatch signals.
International Fire Chiefs Plain Language Position Statement	The IAFC adopts the position to encourage chiefs of fire and rescue departments to implement radio practices that minimize or eliminate coded substitutions for English language in their respective departments.
Northern Virginia Common Language Policy	Regional Common Language Protocol adopted by the Northern Virginia Police Chiefs and Sheriffs on April 11, 2007 with an implementation date of July 1, 2007.
December 2006 NIMS Alert - NIMS and Use of Plain Language	It is required that plain language be used for multi-agency, multi-jurisdiction and multi-discipline events, such as major disasters and exercises. Beginning FY 2006, federal preparedness grant funding is contingent on the use of plain language in incidents requiring assistance from responders from other agencies, jurisdictions, and functional disciplines.
The Road to Plain Language for Mesa, Arizona Police Department	Presentation done by Mesa, Arizona Police Department regarding the process they used to implement plain language.
1975 Ten Code Versus Clear Speech Communication Study of Lakewood, CO	This study compares use of a ten code system to clear speech communication. By random sample technique, the error factor of both systems is determined. Test results indicate that clear speech transmissions, insofar as the Lakewood Police Department study is concerned, are more error free than a code system - even with refresher training.
Common Language Protocol The Future of Communication for the Louisiana State Police	Detailed case study of Louisiana State Police move toward plain language. The case study is written by Major David Staton, Crisis Response Section.
Northern Virginia Common Language Protocol Presentation	PowerPoint presentation that provides an overview of Northern Virginia's move to common language and detail on the implementation.

Resource	Description
Virginia Common Language Protocol Case Study	Detailed case study on the Commonwealth of Virginia's adoption of a common language protocol to improve interoperability during multi-agency and multi-jurisdictional events. The Common Language Protocol enables public safety officers to use plain English for day-to-day radio communications and a limited number of statewide coded transmissions to ensure responder safety.
Presentation on Virginia's Move to Statewide Common Language Protocols	The presentation describes Virginia's FY 2006 and planned FY 2007 activities to move to plain language. In addition to detailing the initiative to move to plain language, the presentation also provides a very brief overview of Virginia's common language protocol.
Incident Command System - Fire Protection Publications – Oklahoma State University	Clear text words and phrases along with application.
Stakeholder Matrix/Communications Plan	Outlines key steps to consider in developing a communications plan and addressing stakeholder concerns
NIIX Plain Language Community	The Goal of the Plain Language Community is to address the issue of inconsistent 10-code use and support increased adoption and use of plain language protocols throughout the nation's public safety agencies.