PLAIN LANGUAGE GUIDE

Making the Transition from Ten Codes to Plain Language

Homeland Security

PURPOSE

This brochure outlines an approach for emergency response agencies, localities, and states to replace coded language radio transmissions with plain language. This brochure includes:

- Reasons to adopt plain language
- Processes to make plain language a reality
- Resources for transitioning to plain language

For emergency response agencies to become fully interoperable, it is important to understand the level of effort, resources, and key actions required to transition to plain language while continuing to meet individual agency needs.

Although at times the information in this brochure may seem broad, this approach is intentional – a successful transition can only occur after partnerships are formed among various emergency response agencies and levels of government. Plain language for radio communications is a key component of interoperability – agencies can only begin to work together if they are all speaking the same language.

"Plain language is the future of law enforcement communication. Transitioning from 10-codes to plain language is not difficult, but it requires cultural change within the organization. Leadership from commanders and supervisors, along with buy-in from officers, is the key to success. As with all change, the use of plain language improves with time."

– Major David Staton, Louisiana State Police

BEST PRACTICE

Excerpt from the December 2006 National Incident Management System (NIMS) ALERT: "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. NIMS implementation is a long-term effort and it is probably not possible to persuade everyone to change ingrained habits overnight. But we do hope that over time, everyone will understand the importance of using common terminology, that is, plain language, every day."

BACKGROUND

The advent of one-way police radio broadcasts to patrol cars in the mid to late 1920s and the introduction of two-way police mobile communications in the early 1930s revolutionized the way law enforcement officers communicated. By the 1940s, the deployment of two-way radio systems began to overload early single channel radio systems. At the same time, there was a desire to protect the content of transmissions because the channels could be monitored.

In an attempt to reduce the volume of radio traffic and add a layer of privacy when communicating, law enforcement officers began using a coded language over the radio called "10-codes." Law enforcement agencies began to develop their own proprietary 10-code system; as a result, 10-88 may mean "present phone number" in one agency and "officer needs help" in another. Because coded language is not standardized across jurisdictions, using 10-codes can result in miscommunication and confusion when multiple agencies and disciplines respond to an incident. This interoperability challenge has resulted in a push for implementing plain language across agencies for mutual aid events so that various disciplines can effectively share information. Plain language, according to NIMS, is the use of common terms and definitions that can be understood by individuals from all responder disciplines. Established by the Secretary of Homeland Security, NIMS only requires plain language for mutual aid scenarios, though it strongly encourages the use of plain language during day-to-day operations as well.

In recent years, controversy has surrounded the migration to plain language radio communications. While many fire departments and emergency medical services (EMS) already use plain language, law enforcement agencies typically use 10-codes for internal radio transmissions. In every agency there are common arguments for and against using 10-codes and plain language.

Without the layer of privacy that 10-codes provide, emergency responders often worry about issues of officer safety, the protection of sensitive information, and the public perception of a lack of professionalism when using plain language. Additional concerns include the potential compromise of airspace, forced changes to computer-aided dispatch (CAD) systems, and the amount of funding needed to shift to plain language. If transitioned correctly, many of these concerns can be overcome.

IN THEIR OWN WORDS

Following a series of interviews with emergency responders at agencies nationwide, the following comments were compiled. These comments represent the most common opinions about using coded language versus plain language.

ISSUE: OFFICER SAFETY

10-Code Position	✦ 10-codes protect the officer.
Plain Language Position	✦ There are no "safe" codes and we need to get over this false sense of security. ✦ People, both good and bad, who regularly monitor public safety communications with scanners will eventually determine the meaning of the codes being used.

Technology has advanced to a point where information can easily fall into the wrong hands. With the prevalence of scanners and the frequent leaking of information on the Internet, it is increasingly easy to access a department's coded language or listen to emergency responder exchanges. However, technology can be used in favor of emergency responders. With encryption capabilities, an added layer of security is possible and coded workarounds can be created for certain scenarios that pose considerable risk to responders.

ISSUE: TRANSMITTING SENSITIVE INFORMATION

10-Code Position	✦ Some information is considered "sensitive" to the victim or the officer and should not be broadcast over the radio. Plain language discloses that information.
Plain Language Position	✦ When communicating sensitive patient information, we know that people who listen to our channels using scanners know every code in the book. Coded language offers no additional privacy. ✦ Most hospital staff rarely keep track of or use codes. We exercise caution when we use plain language.

Imagine that an officer conducts a routine traffic stop and then learns there is a warrant out for the individual's arrest. If the officer prepares to take that person into custody, common radio language could alert the perpetrator of the officer's intent, thereby endangering the officer's safety. To address this issue, some states have developed a plain language protocol augmented with a few coded terms. These terms are only used in situations where plain language could threaten the lives and safety of emergency responders.

MAKING IT HAPPEN

THE TRANSITION PROCESS FROM 10-CODES TO PLAIN LANGUAGE CAN BE BROKEN DOWN INTO FOUR PHASES:

ASSESS

Determine who should participate in the transition and what will be affected by the change

PLAN

Assemble a working group of relevant stakeholders to determine the plain language policy

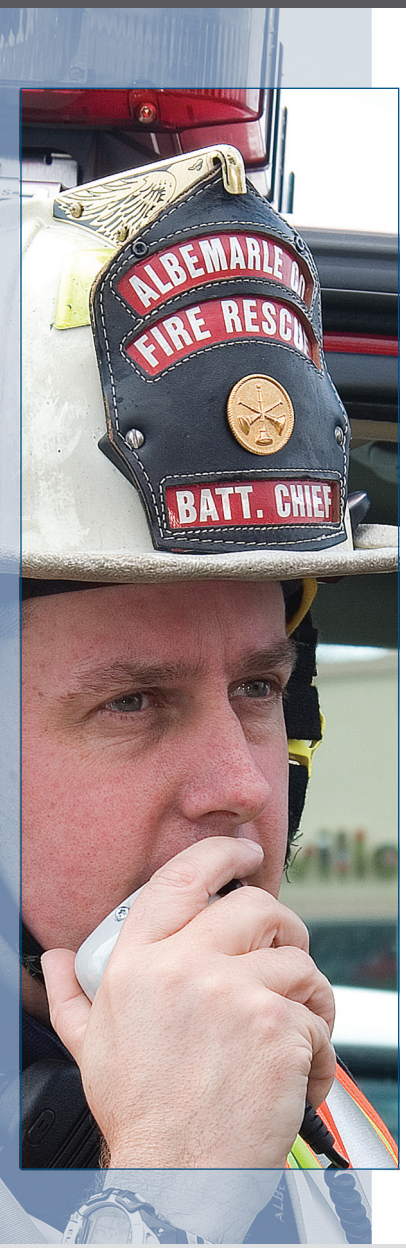
EQUIP

Prepare your stakeholders for plain language by developing any necessary training, standardizing terminology, and making the required adjustments to existing operating procedures and systems

TRAIN & USE

Put the new plain language policy into effect and train emergency responders and dispatchers

ASSESS



The first step for a successful plain language transition is to assess the environment your agency, jurisdiction, or state is working in, and identify potential obstacles and allies. This process will require interviewing or surveying key stakeholders to determine their opinions on plain language. Identified stakeholders may also be able to recommend additional participants during the assessment process. From this pool of people, create a working group to define plain language for your agency, jurisdiction, state, or multiple states. An ideal working group includes individuals from EMS, fire response, and law enforcement agencies in addition to stakeholders from the transportation, game and wildlife, corrections, and utilities communities.

As you begin this work you should:

- Select individuals with decision-making authority or who represent decision makers and have the authority to establish policy within their organization.
- Target senior leaders in the emergency response community who can help make the argument to transition to plain language.
- Engage the largest or most influential agency to support your effort, if possible.
- Coordinate with organizations that represent emergency response officials (such as the International Association of Fire Chiefs, National Association of Emergency Medical Technicians, etc.).
- Create a group large enough to represent the diverse needs and concerns of the entire affected emergency response community, but small enough for team members to conduct manageable and productive discussions.

BEST PRACTICE

The Commonwealth of Virginia used two statewide questionnaires to collect input on plain language from the emergency response community. The Commonwealth's Initiative Action Team sent the questionnaires to police chiefs, fire chiefs, sheriff's offices, EMS supervisors, 911 center supervisors, agencies participating in the Statewide Agencies Radio System, and the police departments of local universities. The first questionnaire identified which organizations were using plain language and which were using 10-codes. The second survey solicited input on specific plain language strategies, such as reprogramming CAD systems. The action team used these surveys to identify which implementation strategies could be reasonably applied on a statewide level.

PLAN

Using a practitioner-driven process involving all stakeholders will increase the likelihood of a successful transition to plain language. The length of time needed to develop plain language policies will vary and will most likely be determined by the level of involvement and cooperation among stakeholders.

During this phase, group members should:

- Review the best practices of other agencies, jurisdictions, and states and utilize the *Resources* section of this brochure on page 10.
- Create a list of plain language phrases to replace 10-codes (Note: A list of phrases was not included in this document due to national variations in plain language).
- Determine if any 10-codes should remain. NIMS does not acknowledge any coded language for mutual aid. However, some agencies, jurisdictions, and states have elected to maintain a few codes for internal use only.

BEST PRACTICE

If possible, a neutral, third-party facilitator should assist the working groups during meetings. The facilitator's role is to drive the meetings to the desired outcomes and ensure the group achieves the tasks it has identified for itself.

When designing your group meetings, keep these working group components in mind:

- **Champion:** Include at least one project champion on your working group who has clout as well as respect and credibility in the emergency response community. Although the champion does not have to be from a large agency, at least one champion from each emergency response discipline is key – if these individuals support the switch to plain language, the effort will likely begin to move forward.
- **Chairs:** Establish co-chairs for the group upon its creation. The co-chairs should represent different disciplines, if possible. It is recommended that one of the co-chairs represent the law enforcement community with the other representing one of the other stakeholder communities (such as EMS or fire response).
- **Meeting Schedule:** Create and publish a meeting schedule outlining when meetings will occur and the purpose and outcomes of each meeting. As the meeting schedule may require changes over time, posting it online where all members can readily access it will reduce confusion. The group should meet face-to-face at least two or three times; the actual amount of time needed for the development of plain language will vary based on the environment in which you are working. Conference calls and e-mail updates in between face-to-face meetings will help keep the group engaged.
- **Charter:** Create a charter that defines the roles and responsibilities of the group as well as the process by which the group will make decisions (such as consensus, unanimous agreement, voting). The charter should also list the members and the agencies represented in the group.

EQUIP

The next step is to equip your agency and agencies across your jurisdiction or state with the tools and procedures discussed in your working group meetings. In this phase, the agencies involved in planning will focus on obtaining buy-in from leadership and decision makers, preparing training programs, developing standard operating procedures, and procuring new equipment, if necessary.

It is also important at this stage to make required adjustments to existing systems. For example, many CAD systems are programmed to accept only 10-codes as incident markers; these systems will most likely have to be reprogrammed. The reprogramming will include translating the existing 10-codes into plain language shorthand. For example, after transitioning to plain language, the CAD system would accept "MVEi" instead of "1050i" for a motor vehicle incident. In addition to reprogramming, keyboards in dispatch centers and vehicles may have to be replaced with keyboards that incorporate the new function keys. To avoid problems, dispatchers should be trained on how to address any CAD system changes resulting from the switch to plain language before the official start date.

If the wait time is reasonable, changes to a CAD system to accommodate plain language may be delayed to coincide with regular upgrade cycles to mitigate the cost of upgrades.

BEST PRACTICE

As your agency transitions to plain language, initially program the CAD system to accept both 10-codes and plain language shorthand until the dispatchers fully adjust. Additionally, ensure that all the systems with which the CAD system interacts have been synchronized. To read the Commonwealth of Virginia Case Study for lessons learned, please visit:
http://www.interoperability.virginia.gov/pdfs/LLIS_CommonLanguageProtocol.pdf

IN-THEIR-OWN-WORDS

Following a series of interviews with emergency responders at agencies nationwide, the following comments were compiled. These comments represent the most common opinions about using coded language versus plain language.

ISSUE: COMPUTER-AIDED DISPATCH SYSTEM

10-Code Position	✦ Plain language will require changes to CAD systems and procedures.
Plain Language Position	✦ CAD systems should meet department needs and expedite delivery of service. The users should not serve the computer. ✦ CAD systems are normally updated from time to time and the change to plain language can be timed to coincide with other changes. Although groups may come up with lists of phrases, after implementation new ones are generally discovered. For this reason, CAD changes are best made after the agency has experience with the new way to communicate.

Transitioning from 10-codes to plain language will require changes in the training and technology. Updating your agency's CAD system is not an insurmountable task and can be approached in several ways. In order to keep the system running smoothly during the transition, consider developing a schedule detailing when updates will be made. This will help the project stay on course and keep all participants informed of the upcoming changes. Another option is to allow the CAD system to continue to accept 10-code calls for a specific time period following the reprogramming. This approach was used in the state of Virginia and helped dispatchers gradually adjust to the change.

ISSUE: TRAINING AND FUNDING

10-Code Position	✦ Transitioning to plain language will be expensive, and an agency will have to figure out how to pay for it.
Plain Language Position	✦ Transitioning to plain language is not very costly. Ask someone to write the protocol internally during roll call and ensure that training is implemented.

Issues related to funding and training go hand-in-hand and can be resolved through advanced planning. Traditionally, the most costly portion of transitioning to plain language is the necessary training for officers, officials, dispatchers, and CAD operators. An agency should look for available training resources within its organization to save money. Depending on the flexibility and availability of resources within your organization, a staff member can conduct training in-house in a few hours. Ideally, refresher training would be held several times per year.

TRAIN & USE

Once the product of the working group is approved by leadership and adopted as policy, the transition process to plain language can move to the next step: training. The announcement regarding the implementation of plain language and the initial phase of training should include both management- and operational-level personnel. Change is easier to accept when field personnel understand that their peers participated in the process.

The actual training should include all ranks of emergency responders and staff personnel who are involved in operations and communications aspects of the job. It is also important that the same training material be used by all disciplines; establishing standard training will reduce misconceptions at the beginning of implementation and avoid problems in the future.

Actual training should consider the following best practices and lessons learned:

- Training aids should be a final product of the working group.
- Team training should be conducted with representatives from both line and staff units.
- Including representatives from various disciplines will help unite the various groups behind this common issue.
- Feedback received while training attendees should be documented, as training may uncover valid issues.
- The importance of using standard phrases should be emphasized to control the use of air time and reduce confusion.
- It is best if a working group member is present when his or her discipline (EMS, fire response, law enforcement) is being trained. This individual can emphasize that the needs of each discipline were well represented throughout the process.
- Handouts that show the old codes or signals and the current, corresponding phrases should be available at each session.
- Agencies that use CAD, in-car computers, or both should have an Information Technology representative present at each session to explain when computer and keyboard updates will be made.
- Additional support tools, such as visor cards listing the plain language phrases, should be available during training.
- Dispatchers should be trained alongside field personnel to ensure that both groups receive the same instructions and the same answers to questions.

CONCLUSION

Plain language simplifies the communication process and reduces the chance of error during an emergency situation. Agencies transitioning to plain language will succeed by partnering with a diverse group of stakeholders across all disciplines, developing a practitioner-driven action plan, and properly training field personnel and staff affected by the change.

RESOURCES

As you address the complexities of transitioning from 10-codes to plain language, consult these resources for additional support, guidance, and real-life examples of plain language at work:

Federal Emergency Management Agency Web site:
http://www.fema.gov

National Integration Center Incident Management Systems Integration Division's National Incident Management System Web site. This site provides answers to frequently asked questions and addresses compliance issues:
http://www.fema.gov/emergency/nims

FY 2007 NIMS Compliance Metrics Guide for States and Territories will assist states and territories in the measurement and reporting of NIMS compliance. Reference pages 8, 10, 93, 94, and 100:
http://www.fema.gov/pdf/emergency/nims/fy07_comp_guide_st.pdf

FY 2007 NIMS Compliance Metrics Guide for Tribal Nations and Local Governments will assist tribal nations and local governments in the measurement and reporting of NIMS compliance. Reference pages 9, 10, 78, and 85:
http://www.fema.gov/pdf/emergency/nims/fy07_comp_guide_tl.pdf

SAFECOM is a communications program of the Department of Homeland Security. SAFECOM provides research, development, testing and evaluation, guidance, tools, and templates on interoperable communications issues to local, tribal, state, and Federal emergency response agencies:
http://www.safecomprogram.gov

To download a PDF copy of the **Commonwealth of Virginia's Common Language Protocol case study**, please visit:
http://www.interoperability.virginia.gov/pdfs/LLIS_CommonLanguageProtocol.pdf

Lessons Learned Information Sharing Web site. This site is the national network of lessons learned and best practices for emergency responders and homeland security officials. The site is secure and has restricted access, so a username and password must first be requested:
http://www.LLIS.gov

Office of Community Oriented Policing Services (COPS) Web site. The mission of COPS, a component of the Department of Justice, is to advance community policing in jurisdictions of all sizes across the country:
http://www.cops.usdoj.gov/

SAFECOM is a communications program of the Department of Homeland Security. SAFECOM provides research, development, testing and evaluation, guidance, tools, and templates on interoperable communications-related issues to local, tribal, state, and Federal emergency response agencies. The Office of Emergency Communications (OEC) supports SAFECOM's development of grant guidance, policy, tools, and templates, and provides direct assistance to local, tribal, state, and Federal practitioners. The Office for Interoperability and Compatibility (OIC) supports SAFECOM's research, development, testing and evaluation, standards, and tools such as reports and guidelines. OEC is an office within the Directorate for National Protection and Programs. OIC is an office within the Science and Technology Directorate.

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