



City of Rochester

# LANGUAGE ACCESS PLAN FOR LIMITED ENGLISH PROFICIENT INDIVIDUALS

Police Accountability Board

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## **Part 1 - Our Agency's Services**

This Language Access Plan has been prepared to comply with the New York State Executive Law Section 202.a enacted on July 1, 2022. It also addresses how the agency complies with the Federal American Disabilities Act.

In this plan, LEP individuals are understood as people who do not speak English as their primary language and who have a limited ability to read, speak, write or understand English.

### **POLICE ACCOUNTABILITY BOARD**

The Police Accountability Board is an independent, community-led agency within the City of Rochester, created in 2019, and set forth in Section 18 of the Rochester City Charter. It is tasked with bringing accountability and transparency to the Rochester Police Department. The Rochester City Charter gives the PAB a broad range of abilities including the following:

- The ability to examine all RPD policies, procedures, practices, and trainings.
- The ability to educate and engage the community regarding policing and public safety practices.
- The ability to independently investigate potential wrongdoing by individual officers, including by issuing subpoenas and reviewing investigatory materials obtained by the RPD.
- The ability to create proposed policies, procedures, and legislation to change our public safety system.
- The ability to hire staff to exercise all of these powers.

## **SCOPE OF INTERACTION BETWEEN ROCHESTER COMMUNITIES AND THE PAB**

The PAB primarily interacts with the City of Rochester and Monroe County communities in the following ways:

- At planned meetings and forums. These meetings are conducted in English with ASL interpreters, depending on availability. All meetings have the ability for LEP interpreters to be requested. Board meetings are uploaded to YouTube where captions can be translated.
- On an emergency or on an as needed basis.
- During Community events often staffed informally by multilingual PAB staff.
- Direct call from residents for information or to report a complaint.
- Through intakes/interviews by phone or in person when contacted or PAB Case Managers and/or Investigators.
- While testifying or giving evidence.
- Through written forms, documents, and notices.

### **Part 2 - The Limited English Proficient Population in Our Service Area**

The Statewide Language Access Law requires state agencies to translate vital agency documents into the top twelve most commonly spoken non-English languages of the New York State population.

***Under the law, New York State agencies that provide services or benefits to the public must:***

1. *Offer interpretation services to the person receiving services or benefits in their primary language, including American Sign Language (ASL).*
2. *Translate vital documents related to their services or benefits into the top 12 languages spoken by New Yorkers who don't speak English very well. Agencies may also choose to translate their vital documents into up to four more languages based on criteria detailed in the language access law.*
3. *Choose a Language Access Coordinator who will work with the Office of Language Access to make sure their agency is following the language access law.*
4. *Post their Language Access Plan on their agency's website and update it every two years.*

<https://ogs.ny.gov/know-your-rights>

The twelve top languages taken from the U.S. Census as defined by the NY State Law Access website are: Arabic, Bangla, Chinese (including Cantonese and Mandarin), French, Haitian Creole, Italian, Korean, Polish, Russian, Spanish, Urdu and Yiddish.

It is the discretion of the Executive Director to include up to four more languages. At the time of preparation of this plan it has been noted through information from the Rochester City School District that Somali, Burmese and Nepalese are languages often utilized in the city of Rochester.

Rochester is the home of the largest number of Deaf people per capita in the United States. It is already mandated by both the NY State Language Law and the ADA that all public access be available with qualified ASL interpreters.

Our Agency tracks information on LEP through hours requested through agencies contacted for interpretation, the amount of calls that the Bilingual staff handle and the amount of walk-ins that the Bilingual staff handle.

### **Part 3 - Public Outreach about the Availability of Language Access Services**

The Police Accountability Board informs individuals about their right to free language access through:

- The use of Language Access Sign posted in the lobby
- Information published on our website
- Outreach and presentations with Bilingual Staff
- The Outreach staff carry language access cards and have the ability to use Language Line in the field.

### **Part 4 – Provision of Language Access Services**

- A. Determining the Need for Services.
  1. During in person encounters, the agency has posted signs with native languages informing LEP to point to their native language so that an interpreter can be provided free of charge.
  2. Field staff carry language access information to facilitate language with LEP individuals.
  3. Bilingual staff members and staff with knowledge of other languages, when available, will assist in identifying the need for assistance with language interpreters.
  4. Staff will be trained on a yearly basis on how to utilize the Language Line tools and system.
  5. At the time of preparation of this plan, the PAB has staff members with fluency in the following languages: 4 Spanish, 1 ASL, 1 French, 1 Vietnamese, 1 Korean, 1 Japanese and 1 German.
  6. If services are needed, staff will utilize Language Line. If in person interpreting services are needed, the staff will contact the Language Access Coordinator to arrange accommodations.
  7. The use of family members, friends or other interpreter should be discouraged and only utilized in an emergency or to help set up accommodations.

#### B. Language Access Coordinator Responsibilities

1. The Language Access Coordinator (LAC) maintains a list of resources for interpreting and translations for the twelve plus languages.
2. The LAC maintains a list of the documents in both the original and translated versions.
3. The LAC will maintain the procedures for accessing language interpreting/translation services.
4. The LAC is responsible for training staff on language access tools, procedures, calendar, and cultural competency.
5. The LAC is responsible for tracking the use of all language access.

#### C. Translation of Documents

1. At least every two years the PAB, with the renewal of this document, will reassess which documents are vital and therefore need to be translated. Vital is defined as any document required to access services.
2. At least every two years the Executive Director will reassess what languages, if any, should be added to the required twelve.
3. The Staff of the PAB will make sure that documents are written in plain language before they are translated.
4. The LAC maintains a list of resources for translation services.

The Following is a list of the translated documents at the time of preparation of this plan. Documents with an asterisk (\*) are determined to be vital documents.

AR: Arabic

BE: Bengali

CH: Chinese

FR: French

HA: Haitian – Creole

IT: Italian

KO: Korean

PO: Polish

RU: Russian

SP: Spanish

UR: Urdu

YI: Yiddish

Name	AR	BE	CH	FR	HA	IT	KO	PO	RU	SP	UR	YI	Additional Languages
Complaint*	X	X	X	X	X	X	X	X	X	X	X	X	
Grievance*	X	X	X	X	X	X	X	X	X	X	X	X	
What is Police Misconduct?										X			
Statute of limitations										X			
Duplicate case template										X			
Withdrawal letter										X			
P&O Transfer Letter										X			
Confirmation Letter										X			
Status Update Letter										X			
Combined English Matrix										X			
Cost of Misconduct										X			
Juvenile Use of Force Oversight Investigations Report										X			
Cost of Misconduct info sheet										X			
Data Transparency Proposal for Change										X			
Public Intake Form										X			
Protest Policies										X			
Protest Policies Flyer										X			
Right to Know Proposal for Change										X			
Right to Know Survey										X			
Executive Director Flyer										X			
Soft Launch Flyer										X			

## **Part 5 – Staff Training**

The Language Access Coordinator is responsible for training the staff in language access services and tools. This training includes:

1. The legal obligations to provide services.
2. The resources for providing services.
3. The procedure on how to access in person interpreting.
4. The procedure on how to acquire translation services.
5. How to access and work with interpreters.
6. Cultural competency and cultural sensitivity.
7. Maintaining records of language access services.

This training shall take place annually for all staff who come in contact with the public. Additional training or refresher courses can be offered. All newly hired employees shall receive training as part of their onboarding.

## **Part 6 – Monitoring the Plan and Responding to Complaints**

### **A. Monitoring**

It is the LAC responsibility to monitor implantation of the LAP to ensure compliance.

This includes necessary signage, proper accommodations, and trainings. It is also the LAC responsibility to ensure the website includes the most updated information.

### **B. Grievance**

Information in the twelve top languages is available on our website to file a grievance if any individual feels that they have not been provided adequate language access services because of their limited English Proficiency. There will be no retaliation or adverse action due to a file complaint. All complaints are forwarded to the LAC for investigation and resolution.

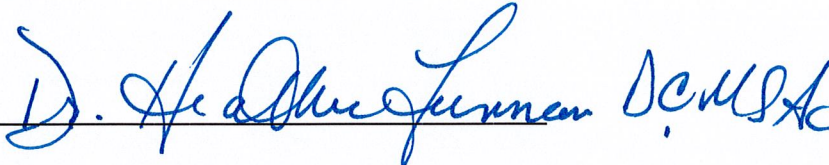
## Part 7 – Signatures

This Language Access Plan has been prepared by:

Dr. Heather Feinman DC, MS Ac

Language Access Coordinator

[Heather.Feinman@CityofRochester.gov](mailto:Heather.Feinman@CityofRochester.gov)

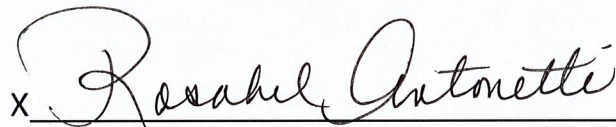
X  Dr. Heather Feinman DC, MS Ac

This Language Access Plan has been reviewed by:

Rosabel Antonetti

Director of Operations

[Rosabel.Antonetti@CityofRochester.gov](mailto:Rosabel.Antonetti@CityofRochester.gov)

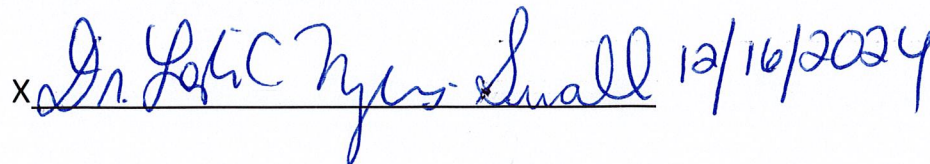
X  Rosabel Antonetti

This Language Access Plan has been approved by:

Dr. Lesli Myers-Small

Executive Director

[Lesli.Myers@CityofRochester.gov](mailto:Lesli.Myers@CityofRochester.gov)

X  Dr. Lesli Myers-Small 12/16/2024

## Language Access Grievance Form

Police Accountability Board language access policy requires interpretation services in any language and to translate important documents into at least the top twelve most common non-English languages in the state. If you have had trouble with our agency's language access services, you may complete and submit this grievance form using the contact information provided above.

**All personal information in your complaint will be kept confidential.**

<b>1. First name:</b> _____ <b>Last name:</b> _____ <b>Zip code:</b> _____ <input type="checkbox"/> I prefer not to provide my name. <i>Please note, if you do not provide any contact information, we will not be able to inform you of the steps we are taking to respond to your complaint.</i> <b>Preferred language(s):</b> _____ <b>Phone number:</b> _____ <b>E-mail address:</b> _____ <b>Is someone else helping you file this grievance?</b> <input type="checkbox"/> No <input type="checkbox"/> Yes If 'Yes,' include their contact information: <b>First name:</b> _____ <b>Last name:</b> _____ <b>E-mail address and/or phone number:</b> _____
<b>2. What language(s) did you need services in?</b> _____
<b>3. What was the problem?</b> Check all the boxes that apply and explain below. <input type="checkbox"/> I was not offered an interpreter <input type="checkbox"/> I asked for an interpreter and was denied <input type="checkbox"/> The interpreter's skills were not good (include their names in section 5 below, if known) <input type="checkbox"/> The interpreter made rude or inappropriate comments <input type="checkbox"/> I waited for too long for an interpreter <input type="checkbox"/> I was not given forms or notices in a language I can understand (list documents needed in section 5 below) <input type="checkbox"/> Other (explain) _____
<b>4. When did this incident happen?</b> If it happened more than once, indicate the date of the most recent incident. <b>Date (MM/DD/YYYY):</b> _____ <b>Time:</b> _____ <input type="checkbox"/> AM <input type="checkbox"/> PM <b>Where did this incident happen?</b> <input type="checkbox"/> Over the phone <input type="checkbox"/> In-person Provide address: _____
<b>5. Describe what happened.</b> Be specific and provide as much detail as possible. If it happened more than once, include each date/time and describe each incident. List any services and documents you were trying to access. Include names, addresses, and phone numbers of people involved, if known. Use additional pages as needed and write your name on each sheet.
<b>6. Did you complain to anyone from the PAB staff? If yes, include who you spoke with and what their response was.</b> Please be specific.
<b>Print Name:</b> _____ <b>Date (MM/DD/YYYY):</b> _____ <div style="text-align: center; font-size: small;">(Person making the grievance)</div>



# PAB

**POLICE  
ACCOUNTABILITY  
BOARD**

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**Email:** [LanguageAccess@CityofRochester.gov](mailto:LanguageAccess@CityofRochester.gov)

**Language Access Coordinator:** Dr. Heather K. Feinman

[Heather.Feinman@CityofRochester.gov](mailto:Heather.Feinman@CityofRochester.gov)