



LANGUAGE ACCESS PLAN

Police Accountability Board



TABLE OF CONTENTS

DEFINITIONS	2
PAB BACKGROUND.....	5
SCOPE OF INTERACTION BETWEEN ROCHESTER COMMUNITIES AND THE PAB ...	6
IDENTIFYING PEOPLE IN COMMUNITIES WHO NEED LANGUAGE ASSISTANCE SERVICES	6
VARIABLES THAT MAY IMPACT THE QUALITY OF COMMUNICATION BETWEEN PAB REPRESENTATIVES AND MEMBERS OF THE DEAF AND HARD OF HEARING COMMUNITY	7
A. Hearing Levels.....	7
B. Communication Preferences	7
C. In-person interactions	7
D. Interactions via phone	9
E. Language Fluency and Considerations	10
PROVIDING LANGUAGE ASSISTANCE SERVICES	10
A. Office Visit to PAB with a Prior Appointment (Scheduled Appointments)	10
B. In-office Visits to PAB Without a Prior Appointment (Drop-ins)	11
C. In-office Telephonic Interpreting Procedures	11
D. In-Office Video interpreting procedure	12
E. Telephone Calls	12
F. Written Correspondence	13
TRAINING OF STAFF ON POLICIES AND PROCEDURES	13
MONITORING, EVALUATING, AND UPDATING THE LANGUAGE ACCESS POLICY DIRECTIVES, PLANS, AND PROCEDURES	14
COMPLAINT PROCEDURE	15
ADDENDUM	15
Appendix A: Languages Spoken in Monroe County	
Appendix B: Language Identification Guide	
Appendix C: Language Access Services Grievance form	
Attachments	

DEFINITIONS

What is Language Access?

Language Access means providing Limited English Proficient (LEP) individuals access to the same services provided to English speakers, in their language. Language Access allows for people with Limited English Proficiency to use and benefit from a wide range of services. Any organization that receives federal funding is required to provide language access for its services.

Who is a Limited English Proficient individual?

Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English are considered Limited English Proficient. This is commonly referred to as "LEP." The site www.lep.gov states: These individuals may be entitled to language assistance with respect to a particular type of service, benefit, or encounter. An individual may possess sufficient English language skills to function in one setting but may not feel comfortable doing so in another.

What is the difference between interpreting and translation?

The difference between interpreting and translation is in the medium: interpreting is for verbal communication while translating is for written text.

What is meaningful access?

Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency," issued in 2000, seeks to ensure that Limited English Proficient individuals are able to receive information and services from federal agencies and that federal agencies are able to communicate with Limited English Proficient persons in the course of their activities.

What is a Language Access Coordinator?

The Language Access Coordinator is the point individual responsible for maintaining, applying, and executing the Police Accountability Board's (PAB) Language Access Plan. They are directly responsible for engaging a competent interpreter and translator to interpret/translate correspondence and any necessary response. If expert knowledge from other staff is needed to answer the constituent correspondence, the Language Access Coordinator will be responsible for gathering this information and making sure it is incorporated into the response. The Language Access Coordinator should maintain a file of the original correspondence, translated correspondence, original answer and translated answer for future reference. Translated correspondence should be sent no later than seven business days.

What is LanguageLine Solutions?

In addition to PAB staff, interpreter services are currently provided by LanguageLine Solutions (LanguageLine), a private telephonic interpreting agency that provides remote interpreter services in over 200 languages. LanguageLine uses a number of industry-standard quality assurance measures, including rigorous screening and evaluation of its new hires and regular live monitoring of its interpreters by internal quality assurance teams. In addition, the PAB's Office is committed to following up any complaints related to the quality of interpreting, provided either internally or by our vendor. See page 15 for more details on the filing of complaints as related to this Language Access Plan.

How do you request an ASL Interpreter?

When a community member needs an American Sign Language (ASL) interpreter, the PAB's Language Access Coordinator will contact Sign Language Connect (SLC), part of Center for Disability Rights (CDR), to schedule in-person or remote ASL interpreting services. Remote service will be accessed by a laptop, phone, computer or tablet. If the customer prefers an in-person ASL interpreter one will be requested through Sign Language Connect/Center for Disability Rights at a scheduled date and time (by appointment).

LANGUAGE ACCESS PLAN FOR POLICE ACCOUNTABILITY BOARD

Rochester, New York

BACKGROUND

Legal Authority. The goal of language access planning and implementation is to ensure that the Police Accountability Board (PAB) communicates effectively with people who are limited English proficient in the City of Rochester and Monroe County.

At the federal level, Executive Order 13166 and Title VI of the Civil Rights Act of 1964, Title VI require that agencies receiving federal funding provide language support necessary for meaningful participation by LEP persons in programs and activities. Failure to provide meaningful language access is a form of national origin discrimination under Title VI, even if the discrimination is not intentional.

In New York State, Executive Order 26.1 was signed in March 2021 which directs executive state agencies that provide direct public services to offer language assistance services (translation and interpretation) to people with Limited English Proficiency. While PAB is not an executive state agency within the meaning of the Executive Order, the Board is committed to removing barriers and values meaningful participation for thousands of New Yorkers in Monroe County who do not speak English as their primary language and have 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 and without Spanish or ASL interpretation, depending on availability.
- On an emergency or on an as-need basis.
- During Community events such as informational forums and community events. These events are often staffed informally by multilingual PAB staff.
- Direct call from Rochester City and Monroe County 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.

IDENTIFYING PEOPLE IN COMMUNITIES WHO NEED LANGUAGE ASSISTANCE SERVICES

The PAB strives to communicate effectively with every individual who is Limited English Proficient, Deaf/Hard of Hearing, or a combination of who reside in the Greater Rochester Area. The Greater Rochester Area has the following demographic characteristics:

Racial Makeup. Monroe County has an overall population of 759,443. Of those, 70 percent identify as white; 16.2 percent identify as Black or African American; 3.7 percent as Asian, and Hispanic or Latino as 9.2 percent according to 2020 Census.

Education. 90 percent of the population over the age of 25 in Monroe County are high school graduates or higher. 38.6 percent of the population over the age of 25 have a bachelor's degree or higher.

Language Other than English Spoken at home. 14 percent of the population speak a language other than English at home. 8.7 percent of the population in Monroe County are foreign born. The top five language spoken other than English are as follows based on <https://censusreporter.org/> :

- a. Spanish – 6 percent
- b. Italian – 0.97 percent
- c. Arabic – 0.79 percent
- d. Nepali, Marathi, or other Indic languages – 0.72 percent
- e. Chinese (Mandarin and Cantonese) – 0.63 percent

Appendix A shows a detailed breakdown of languages spoken and ability to comprehend English.

Deaf and Hard of Hearing Individuals. There is no one central place to identify how many individuals there are in the Greater Rochester Area that are Deaf, Hard of Hearing, DeafBlind and/or have hearing loss. However, the 2010 American Community Survey suggested 3.7 percent of the Rochester MSA population is deaf or has serious difficulty hearing. By using the same percentages from 2010 and updated population numbers from the 2020 census, we calculated there are approximately 43,695 individuals who are deaf or have serious difficulty hearing in the Rochester area.

An age-related breakdown is as follows:

		0-17		18-25		26-64		65+		Total	
Rochester	Population	# DHH	% DHH	# DHH	% DHH	# DHH	% DHH	# DHH	% DHH	# DHH	% DHH
2010	1,154,703	1,839	0.16%	2,963	0.26%	14,636	1.27%	23,236	2.01%	42,674	3.70%
2020	1,182,337	1,883	0.16%	3,034	0.26%	14,986	1.27%	23,792	2.01%	43,695	3.70%

There are approximately 30 million individuals above the age of 12 who are unable to hear sounds of 25 decibels or less in the speech frequencies in both ears. This number jumps to about 48 million, or 20.3 percent of the population aged 12 or older, who cannot hear these sounds in at least one ear.¹

Given these numbers, it is estimated that there are approximately 144,300 individuals in the Greater Rochester Area who cannot hear sounds of 25 decibels or less in the speech frequencies in both ears. This number increases to 234,000 individuals who cannot hear these sounds in at least one ear.

¹Lin FR, Niparko JK, Ferrucci L. Hearing loss prevalence in the United States. Arch Intern Med. 2011;171(20):1851–3.

There are an estimated 500,000 to 2 million individuals in the United States who communicate primarily through American Sign Language.^[2] In correlation with nationwide percentages of individuals who utilize ASL and with to Rochester having one of the largest numbers of Deaf and Hard of Hearing individuals per capita in the U.S., it is assumed there are approximately 30,000-40,000 ASL users in the Greater Rochester Area.

VARIABLES THAT MAY IMPACT THE QUALITY OF COMMUNICATION BETWEEN PAB REPRESENTATIVES AND MEMBERS OF THE DEAF AND HARD OF HEARING COMMUNITY

There are a number of variables that may impact the quality of communication between PAB representatives and members of the Deaf and Hard of Hearing community. These include the following:

- A. *Hearing Levels.* Hearing levels vary for every Deaf and Hard of Hearing individual. Some individuals may have no hearing at all while others may have the ability to hear in one or both ears. Individuals may use hearing aids and/or cochlear implants to access auditory information; however, these serve as means to amplify sound, but doesn't guarantee comprehension. Some individuals may be born Deaf or Hard of Hearing while others may lose their hearing in one or both ears later in life. It is paramount to recognize that environmental sounds and situations individuals may encounter, including background noises, the speaker's tone and accent, acoustics and even auditory fatigue, can ultimately impact comprehension.
- B. *Communication Preferences.* Instead of relying on someone's hearing level and whether they use hearing aids and/or cochlear implants to determine communication needs, it is best to involve Deaf and Hard of Hearing individuals in the decision-making process of how to best communicate. After all, the Deaf and Hard of Hearing individual(s) are the experts in navigating situations as Deaf and Hard of Hearing individuals. To that end, there is a wide range of communication preferences these individuals may have.
- C. *In-person interactions.* Under no circumstances should an individual be forced to depend solely on their residual hearing, lip reading or writing/typing back and forth. These methods are not always reliable and could greatly increase the risk of miscommunication and contribute to difficulties in collecting information.

Preferences are often contingent on a variety of different factors, including level of hearing, environmental acoustics and the type of interaction. Of the approximately

30,000-40,000 ASL users in the Greater Rochester Area, these individuals may also speak for themselves and may or may not prefer to have a sign language interpreter present to facilitate communication. It is a best practice to mitigate any potential challenges and offer an in-person sign language interpreter if individuals present as ASL users.

It is highly recommended that there be a team of two interpreters as the standard. One interpreter should be a hearing ASL-English interpreter while the second interpreter should be a Certified Deaf Interpreter (CDI).² CDIs are especially beneficial in situations that include individuals who have been language deprived; children with developing language ability; individuals who acquired ASL at a later age; individuals with cognitive or physical challenges that prevent them from fully utilizing a traditional ASL interpreter; or individuals fluent in sign languages other than ASL. Fluent ASL users also benefit from a CDI and hearing ASL-English interpreter team in highly stressful or emotional situations, including cases of mental health, sexual abuse and trauma.

During interactions that include CDIs, the hearing ASL-English interpreter interprets the spoken message to ASL. The CDI then interprets the message into a visual form of communication that is customized to suit the specific needs of the Deaf, DeafBlind or Hard of Hearing consumer. The CDI will also interpret messages conveyed by the consumer into ASL and the ASL-English interpreter will interpret into spoken English.

Deaf and Hard of Hearing individuals may prefer to have a captioner present to caption auditory communication. This technology is known as Communication Access Realtime Translation (CART). Using a stenotype machine, computer, and real-time software, trained captioners transcribe spoken text into words and provide environmental context (e.g., background noises). The text produced by the software is displayed real-time on a computer or laptop monitor, mobile device or tablet. Services can be delivered on location or remotely. While some may prefer to use automatic speech recognition (ASR) software on smartphones or tablets to understand auditory communication, the security and reliability of these platforms may not always be reliable.

Additional Consideration for DeafBlind individuals and Deaf/Hard of Hearing individuals. These individuals have low vision and may need to receive linguistic information by placing their hands on the interpreter's hands while the interpreter signs or fingerspells.

² These specialized interpreters are Deaf, possess native or near-native fluency in ASL and have a deep-rooted understanding of the cultural and linguistic nuances necessary to facilitate effective communication. CDIs collaborate with hearing ASL-English interpreters to effectively provide interpreting, translation, and transliteration services, utilizing American Sign Language and other visual and tactual communication forms used by Deaf, DeafBlind or Hard of Hearing individuals. Mitchell R, Young T, Bachleda B, Karchmer M. How many people use ASL in the United States? Why estimates needed updating. *Sign Lang Stud.* 2006;6:306–335.

This form of interpretation is called tactile interpreting. With tactile interpreting, the interpreter will sit or stand next to the consumer while interpreting. In addition to providing the interpreted message, the interpreter may add visual descriptions to provide visual context. The tactile interpreter may be a CDI or a hearing ASL-English interpreter.

When individuals are only able to see signs at close range, they may need an interpreter to stand or sit less than two feet away from the consumer while interpreting. This form of interpretation is called low-vision interpreting. With low-vision interpreting, it is possible spotlights may need to be placed in such a way that they shine on the interpreter's face and hands. The interpreter may be a CDI or a hearing ASL-English interpreter.

DeafBlind individuals and Deaf/Hard of Hearing individuals also face unique challenges pertaining to orientation and mobility, access to environmental information and transportation. This group may require the use of tactile and/or pro-tactile interpreting along with the use of a qualified and certified interpreter. These individuals may also benefit from Support Service Providers (SSPs), professionals who are trained to work with DeafBlind individuals and mitigate any challenges as it pertains to transportation, access to written material, support with informal communication and environmental information.

A Note on Video Remote Interpreting. While video remote interpreting (VRI) is a service that uses videoconferencing technology, equipment and a high-speed Internet connection with sufficient bandwidth to provide on-demand access to a video interpreter located at a different location, there are limitations to the technology's effectiveness and practicality. It is recommended that VRI be used only as an interim solution if an on-site interpreter is not immediately available.

D. *Interactions via phone.* Deaf and Hard of Hearing individuals have access to a variety of telephone products and services, including voice, text, and video relay services that enable consumer choice of language and mode of communication. Technologies include, but are not limited to the following:

- Amplified telephones are specialized phones designed to produce higher, powerful volumes.
- Captioned phones display spoken words as text during a call in real-time. Captions can be displayed on smartphone apps, a computer/laptop screen,

or a built-in screen on the captioned phone. During these calls, the hearing caller hears whatever the Deaf or Hard of Hearing individual is saying just like they would with a traditional phone call. Services are funded through a federal program and the Federal Communications Commission (FCC) oversees the program.

- Video Relay Service (VRS) enables Deaf and Hard of Hearing users who use ASL to communicate with voice telephone users via video phones instead of using typed text. These video-based calls are made using a high-speed or broadband Internet connection and a videophone connected to a TV, or through a personal tablet, cell phone or computer equipped with a web camera and video relay software. During these calls, the Deaf or Hard of Hearing individual will sign to and watch a video interpreter as they relay the conversation with a voice telephone user. Services are funded through a federal program and the Federal Communications Commission (FCC) oversees the program.
- A TTY, sometimes called a TDD or a Telecommunication Device for the Deaf, is a device that lets Deaf, Hard of Hearing and speech-impaired individuals to access TTY-based Telecommunications Relay Services that enable Deaf, Hard of Hearing and speech-impaired users to use the telephone system and connect with voice telephone users. During these calls, the relay operator will relay the call by voicing what is typed to them by the TTY user and typing what is said to them by the voice telephone user.
- Voice Carry Over (VCO) enables Deaf and Hard of Hearing individuals to speak directly to a voice telephone user. Meanwhile, contingent on the device and service used to make the phone call (e.g., TTY, VCO phone or video relay service), a relay operator or sign language interpreter will translate/interpret what the voice telephone user is saying to the Deaf or Hard of Hearing individual. The presence of the operator or interpreter is generally unknown to the voice telephone user.

E. *Language Fluency and Considerations.* Due to a variety of mitigating factors, Deaf and Hard of Hearing individuals have varying levels of English and American Sign Language fluency. In line with communication preferences, PAB representatives shall utilize the provision of CDIs along with a hearing ASL-English interpreter for signing individuals who may have language disfluency.

PROVIDING LANGUAGE ASSISTANCE SERVICES

A. Office Visit to PAB with a Prior Appointment (Scheduled Appointments)

When scheduling in-person office meetings with potential witnesses, the PAB employee handling the matter must first ascertain whether an interpreter is necessary for the appointment. In the case of a deaf person, the employee should ascertain the need by asking the caller directly at the time when appointment is arranged. The PAB employee handling the matter will communicate the need for an ASL interpreter by email to the Language Access Coordinator for said scheduled date/time of services. If no service is available, the employee will make every effort to reschedule the appointment at a mutually agreeable time when an interpreter is available. In addition, PAB employees must be mindful of conflict-of-interest concerns that may arise when family members, minors, caretakers, among others step into the role of interpreters or translators for potential witnesses.

B. In-office Visits to PAB Without a Prior Appointment (Drop-ins)

When Limited English Proficient, and/or Deaf and Hard of Hearing individuals appear in person at the PAB without a prior appointment, PAB employees will pay close attention to clues indicating barriers in communication such as lack of comprehension, repeated misunderstandings, and speaking in another language not known to the PAB employee interacting with the individual.

All PAB staff will use the following steps to identify a language used by the person visiting PAB:

1. First, the employee will use the Language Identification Guide (See Appendix B) and motion for the individual to point to their preferred language on the board
2. Second, the employee will check with the PAB Language Access Coordinator to ascertain if any PAB employee is able to assist the matter.
3. Third, if no in-house capacity exists to assist the individual who dropped in, and PAB staff is unable to identify the language used by the individual, the PAB employee will call LanguageLine as outlined below and request the assistance of the representative to identify the language.
4. If the client prefers an in-person interpreter one will be requested with at least a 24-to-36-hour notice.

C. In-Office Telephonic Interpreting Procedures

1. PAB staff will call LanguageLine and provide PAB's client ID (please see Language Access Coordinator for client ID number)
2. PAB staff will identify the language that must be interpreted. If staff is/are unable to identify the language the Language Access Coordinator can assist with identification.

3. PAB staff will briefly explain to the interpreter the context of the transaction and any relevant information that may be helpful to the conversation. The role of the interpreter is only to assist with communications and not to provide additional dialog and advocacy.
4. If at any time the Limited English Proficient individual indicates that the interpreter is not correctly translating the conversation or they are not comfortable with the interpreter, they have a right to request a different interpreter. PAB staff member should immediately request a different interpreter if asked.

D. In-Office Video Interpreting Procedure

In-Office Video interpreting procedures differ from telephone encounters in that PAB staff have fewer resources and must have a designated station for video interpreting or provide staff's iPads with updated software for the service, such as account set up, camera and microphone. The same cues should be listened for to determine if the individual might be a Limited English Proficient and prefers a video interpretation vs telephone, Deaf or Hard of Hearing, or otherwise having difficulty understanding information provided or trouble communicating with staff. Once a language has been identified, PAB staff should follow the same procedure used for drop-in appointments.

1. PAB staff will call LanguageLine and provide PAB's client ID (please see Language Access Coordinator for client ID number)
2. PAB staff will identify the language that must be interpreted. If staff is/are unable to identify the language the Language Access Coordinator can assist with identification.
3. PAB staff will briefly explain to the interpreter the context of the transaction and any relevant information that may be helpful to the conversation. The role of the interpreter is only to assist with communications and not to provide additional dialog and advocacy.
4. If at any time the Limited English Proficient or Deaf or Hard of Hearing individual indicates that the interpreter is not correctly translating the conversation or they are not comfortable with the interpreter, they have a right to request a different interpreter. The staff member should immediately request a different interpreter if asked.

E. Telephone Calls

Telephone calls differ from in-person encounters in that PAB staff have fewer resources in order to determine what language assistance is needed. The same cues should be listened for to determine if the individual might be a Limited English Proficient, Deaf or Hard of Hearing, or otherwise having difficulty understanding information provided or trouble communicating with staff. Once a language has been identified, PAB staff should follow the same procedure used

for drop-in appointments. If a language cannot be identified, PAB staff will call LanguageLine and seek assistance in identifying the preferred language.

F. Written Correspondence

The PAB may receive written correspondence in another language from time to time. PAB employee(s) receiving the correspondence should immediately bring it to the attorney or investigator handling the matter, who may triage it further to the Language Access Coordinator. If no PAB Case Manager or Investigator exists for the matter, PAB employee(s) receiving the written correspondence should immediately bring it to the Language Access Coordinator.

PROVIDING NOTICE OF LANGUAGE ASSISTANCE SERVICES

The PAB will inform Limited English Proficient persons of the availability of free language assistance by providing written notice in many languages. Notices and signs will be provided in **unobstructed** view in all publicly accessible areas of the PAB Office, and on its website at www.rocpab.org. These notices and signs are not to be covered, removed, changed, or replaced by anyone without consulting the appropriate Language Access Coordinator. Modifying or removing signs without proper authorization may be subject to discipline.

TRAINING OF STAFF ON POLICIES AND PROCEDURES

It is crucial that all PAB staff understand their responsibility to provide meaningful and timely access to information for people who are Deaf and Hard of Hearing, and Limited English Proficient individuals. PAB will provide training on a regular basis to all staff and update the language access plan on an annual basis. Additionally, the Plan and training will be provided to all newly-hired staff members. Training will include dissemination and review of this Language Access Plan (LAP), any instructional materials, and forms used during communication with Limited English Proficient persons.

EXPECTATIONS OF STAFF

To help facilitate proper use of interpreters and maintain the quality of customer service for Limited English Proficient customers, all Monroe County Clerk's Office staff will be required to meet the following expectations.

- a) Staff must remember that they are having a conversation with the customer, not the interpreter. They will direct their words and eye contact towards the customer.
- b) Staff will be patient. Providing service across a language barrier takes

time.

- c) Staff members will avoid abbreviations, slang, jargon, and acronyms whenever possible. Attempts will be made to use the simplest and clearest language possible to describe internal concepts and rules.
- d) Staff should speak more slowly and in relatively short segments, and pause so the interpreter can interpret.
- e) Staff members should ask customers to repeat back important information that they want to make sure is understood.
- f) Staff will not patronize the customer, and will not treat a Limited English Proficient customer with any less respect than any
- g) other customer.
Staff will not refuse to wait on someone because they are uncomfortable or do not want to use the interpreting services.
- h) Staff will acknowledge the interpreter as a professional in communication. They will respect his or her role and give the interpreter time to restructure information in their mind to present it in a culturally and linguistically appropriate manner.
- i) Staff will not hold the interpreter responsible for what the customer says or doesn't say. The interpreter is the medium, not the source, of the message. If a staff member feels that they are not getting the type of response they were expecting, they will restate the question or consult with the interpreter to better understand if there is a cultural or linguistic barrier that is interfering with communication.

MONITORING, EVALUATING, AND UPDATING THE LANGUAGE ACCESS POLICY DIRECTIVES, PLANS, AND PROCEDURES

The Language Access Coordinator will evaluate and monitor the LAP's content and implementation on an annual basis to ensure that the scope and nature of the language services meet the needs of Deaf and Hard of Hearing individuals, and members of the LEP communities.

On an annual basis, the Language Access Coordinator must review and include an examination of the following issues:

1. Any changes in the demographics of Limited English Proficient and Deaf and Hard of Hearing individuals in the City of Rochester
2. A review of the number of interpreter cases during the year
3. A determination if the existing language assistance services are meeting needs
4. Staff expectations

COMPLAINT PROCEDURE

The Language Coordinator will be responsible for receiving, addressing, and resolving all complaints and grievances. Grievances may be filed with PAB in writing or verbally. The grievance shall include the following information:

- a. Name and address of grievant
- b. Nature of alleged violation
- c. Name of persons responsible for alleged incident
- d. Requested relief or corrective action; and
- e. Name of any person or group assisting to fill out the grievance.

A copy of the Language Access Services Grievance form can be found in Appendix C.

ADDENDUM:

Language Fluency and Considerations:

The current literature reflects that Deaf and Hard of Hearing children are often at risk of having delayed or absent exposure to spoken and visual languages during the critical period of language acquisition. Subsequently, these individuals are at risk of experiencing language deprivation.³

Language deprivation occurs due to a chronic lack of full access to a natural language during the critical period of language acquisition (when there is an elevated neurological sensitivity for language development), approximately the first five years of a child's life.^{4 5} Research shows language deprivation during the critical period can have permanent consequences for long-term neurological and educational development, including the inability to "develop language skills sufficient to support fluent communication or serve as a basis for further learning."^{6 7}

As a likely primary or secondary byproduct of language deprivation, Deaf individuals have been detected to experience a higher prevalence of behavioral health concerns than the general

³ Hall WC, Levin LL, Anderson ML. Language deprivation syndrome: a possible neurodevelopmental disorder with sociocultural origins. *Soc Psychiatry Psychiatr Epidemiol.* 2017;52(6):761-776. doi:10.1007/s00127-017-1351-7

⁴ Mayberry RI, Lock E. Age constraints on first versus second language acquisition: Evidence for linguistic plasticity and epigenesis. *Brain and Language.* 2003;87(3):369–384.

⁵ Newport EL. Maturation constraints on language learning. *Cognitive Science.* 1990;(14):11–28.

⁶ Leybaert J, D'Hondt M. Neurolinguistic development in deaf children: The effect of early language experience. *International Journal of Audiology.* 2003;42(Suppl 1):S34–40.

population, including poorer quality of life and higher levels of emotional distress,⁸ higher levels of interpersonal trauma,⁹ and elevated levels of emotional abuse, physical abuse and sexual violence.¹⁰ Deaf adolescents can experience emotional and behavioral mental health problems associated with low self-esteem and peer rejection,¹¹ and a range of developmental adversities unique to being deaf in a hearing world such as lack of accessible communication with parents and peers.¹²

It is critical that PAB representatives be aware that the Deaf and hard of community may be at risk of having higher prevalence of behavioral health concerns, as well as language difficulties. As iterated previously, the aforementioned challenges can be mitigated by the provision of CDIs along with a hearing ASL-English interpreter.

During any PAB-related investigation, the PAB must be mindful of how it shall also investigate how the police officers and other individuals associated with the police department communicate with the Deaf, Hard of Hearing, DeafBlind and late deafened individuals. For situations involving a signing individual, it is important to understand whether the police used interpreter services, whether it be via in-person interpreter(s) or video interpretation.

With respect to the potential mitigating circumstances, it may not always be possible to provide a team of a hearing ASL-English interpreter and a CDI; however, this should regularly be the standard, especially for highly stressful or emotional situations, including cases of mental health, sexual abuse and trauma.

Additionally, with respect to video interpretation, there have been past instances where police officers instructed or directed Deaf and Hard of Hearing signers to utilize VRS to communicate with the officers. When using VRS, the interpreter, Deaf/Hard of Hearing caller and hearing individual must all be in separate locations. More often than not, VRS interpreters do not have

⁷ Lederberg AR, Schick B, Spencer PE. Language and literacy development of deaf and hard-of-hearing children: Successes and challenges. *Developmental Psychology*. 2013;49(1):15–30. doi: 10.1037/a0029558.

⁸ Fellingner J, Holzinger D, Dobner U, Gerich J, Lehner R, Lenz G, Goldberg D. Mental distress and quality of life in a deaf population. *Social Psychiatry and Psychiatric Epidemiology*. 2005;40(9):737–742. doi: 10.1007/s00127-005-0936-8.

⁹ Anderson ML, Leigh IW. Intimate partner violence against deaf female college students. *Violence Against Women*. 2011;17(7):822–834.

¹⁰ Pollard RQ, Jr, Sutter E, Cerulli C. Intimate partner violence reported by two samples of deaf adults via a computerized American Sign Language survey. *Journal of Interpersonal Violence*. 2014;29(5):948–965. doi: 10.1177/0886260513505703

¹¹ van Gent T, Goehart AW, Treffers PDA. Self-concept and psychopathology in deaf adolescents: Preliminary support for moderating effects of deafness-related characteristics and peer problems. *Journal of Child Psychology and Psychiatry*. 2011;52(6):720–728.

¹² Anderson ML, Wolf Craig KS, Hall WC, Ziedonis DM. A pilot study of deaf trauma survivors' experiences: Early traumas unique to being deaf in a hearing world. *Journal of Child & Adolescent Trauma*. 2016 doi: 10.1007/s40653-016-0111-2.

the appropriate training and requisite knowledge base to be able to adequately interpret these types of interactions. Furthermore, as not all VRS companies utilize CDIs, this could hinder the effectiveness of interactions. The use of VRS should not be a fallback option; instead, the police should have contingency plans in place to secure interpretation services on an as-needed basis.

Alternatively, for those Deaf and/or Hard of Hearing individuals who rely on spoken text being transcribed into words, it is imperative that the PAB understand whether the police provided CART and/or relied on ASR. With respect to the latter, the security and reliability of ASR platforms may not always be reliable and could result in miscommunication and misunderstandings.

Similar to interactions between PAB and members of the greater Deaf, Hard of Hearing and DeafBlind community, under no circumstances should the police force an individual to depend solely on their residual hearing, lip reading or writing/typing back and forth. These methods are not always reliable and could greatly increase the risk of miscommunication and could cause irreparable harm.

ATTACHMENT A

B16001

Language Spoken at Home by Ability to Speak

Monroe County, NY

	Value	Error
Total:	701486	103
Speak only English	600464	6985
Spanish:	42301	3720
Speak English "very well"	24663	3237
Speak English less than "very well"	17638	2352
French (incl. Cajun):	3275	1481
Speak English "very well"	2284	1292
Speak English less than "very well"	991	546
Haitian:	1212	724
Speak English "very well"	944	613
Speak English less than "very well"	268	436
Italian:	6772	2442
Speak English "very well"	4896	2015
Speak English less than "very well"	1876	1256
Portuguese:	765	413
Speak English "very well"	354	282
Speak English less than "very well"	411	331
German:	1927	710
Speak English "very well"	1438	590
Speak English less than "very well"	489	292
Yiddish, Pennsylvania Dutch or other West Germanic languages:	168	165
Speak English "very well"	71	114
Speak English less than "very well"	97	115
Greek:	231	222
Speak English "very well"	231	222
Speak English less than "very well"	0	207
Russian:	3685	1801
Speak English "very well"	2546	1245
Speak English less than "very well"	1139	971
Polish:	834	536
Speak English "very well"	475	263
Speak English less than "very well"	359	342
Serbo-Croatian:	2201	1778
Speak English "very well"	1754	1658
Speak English less than "very well"	447	365
Ukrainian or other Slavic languages:	2337	989
Speak English "very well"	1250	784
Speak English less than "very well"	1087	496
Armenian:	165	276
Speak English "very well"	165	276

Speak English less than "very well"	0	207
Persian (incl. Farsi, Dari):	789	890
Speak English "very well"	536	579
Speak English less than "very well"	253	396
Gujarati:	565	480
Speak English "very well"	525	470
Speak English less than "very well"	40	66
Hindi:	947	685
Speak English "very well"	863	667
Speak English less than "very well"	84	151
Urdu:	1227	911
Speak English "very well"	1116	854
Speak English less than "very well"	111	157
Punjabi:	562	576
Speak English "very well"	379	396
Speak English less than "very well"	183	223
Bengali:	553	693
Speak English "very well"	341	416
Speak English less than "very well"	212	331
Nepali, Marathi, or other Indic languages:	5075	2257
Speak English "very well"	1557	836
Speak English less than "very well"	3518	1918
Other Indo-European languages:	783	662
Speak English "very well"	444	425
Speak English less than "very well"	339	479
Telugu:	312	378
Speak English "very well"	312	378
Speak English less than "very well"	0	207
Tamil:	367	411
Speak English "very well"	367	411
Speak English less than "very well"	0	207
Malayalam, Kannada, or other Dravidian languages:	606	605
Speak English "very well"	516	526
Speak English less than "very well"	90	96
Chinese (incl. Mandarin, Cantonese):	4392	1296
Speak English "very well"	2097	948
Speak English less than "very well"	2295	852
Japanese:	483	309
Speak English "very well"	405	266
Speak English less than "very well"	78	92
Korean:	1271	712
Speak English "very well"	554	353
Speak English less than "very well"	717	536
Hmong:	0	207

Speak English "very well"	0	207
Speak English less than "very well"	0	207
Vietnamese:	2562	1340
Speak English "very well"	1493	937
Speak English less than "very well"	1069	616
Khmer:	309	447
Speak English "very well"	0	207
Speak English less than "very well"	309	447
Thai, Lao, or other Tai-Kadai languages:	498	552
Speak English "very well"	256	335
Speak English less than "very well"	242	267
Other languages of Asia:	2749	2215
Speak English "very well"	1379	1257
Speak English less than "very well"	1370	1050
Tagalog (incl. Filipino):	675	468
Speak English "very well"	625	451
Speak English less than "very well"	50	62
Ilocano, Samoan, Hawaiian, or other Austronesian languages:	86	144
Speak English "very well"	0	207
Speak English less than "very well"	86	144
Arabic:	5532	3647
Speak English "very well"	2586	2205
Speak English less than "very well"	2946	1758
Hebrew:	1218	993
Speak English "very well"	671	514
Speak English less than "very well"	547	847
Amharic, Somali, or other Afro-Asiatic languages:	1303	873
Speak English "very well"	735	608
Speak English less than "very well"	568	533
Yoruba, Twi, Igbo, or other languages of Western Africa:	666	535
Speak English "very well"	371	466
Speak English less than "very well"	295	222
Swahili or other languages of Central, Eastern, and Southern Africa:	613	562
Speak English "very well"	505	536
Speak English less than "very well"	108	178
Navajo:	0	207
Speak English "very well"	0	207
Speak English less than "very well"	0	207
Other Native languages of North America:	25	47
Speak English "very well"	25	47
Speak English less than "very well"	0	207

Other and unspecified languages:	981	633
Speak English "very well"	889	535
Speak English less than "very well"	92	124

**2004
Census
Test**

United States
**Census
2010**

LANGUAGE IDENTIFICATION FLASHCARD

<input type="checkbox"/>	ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.	1. Arabic
<input type="checkbox"/>	Խոսողո՞ւմ ե՞ս, կ՞արեա՞ր եմ քանակապետ, եթե խոսում կամ կարդում եմ հայերեն:	2. Armenian
<input type="checkbox"/>	যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন।	3. Bengali
<input type="checkbox"/>	ល្អបញ្ជាក់ក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។	4. Cambodian
<input type="checkbox"/>	Motka i kahhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro.	5. Chamorro
<input type="checkbox"/>	如果你能读中文或讲中文，请选择此框。	6. Simplified Chinese
<input type="checkbox"/>	如果你能讀中文或講中文，請選擇此框。	7. Traditional Chinese
<input type="checkbox"/>	Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.	8. Croatian
<input type="checkbox"/>	Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky.	9. Czech
<input type="checkbox"/>	Kruis dit vakje aan als u Nederlands kunt lezen of spreken.	10. Dutch
<input type="checkbox"/>	Mark this box if you read or speak English.	11. English
<input type="checkbox"/>	اگر خواندن و نوشتن فارسی بلد هستید، این مربع را علامت بزنید.	12. Farsi

<input type="checkbox"/>	Cocher ici si vous lisez ou parlez le français.	13. French
<input type="checkbox"/>	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.	14. German
<input type="checkbox"/>	Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά.	15. Greek
<input type="checkbox"/>	Make kazye sa a si ou li oswa ou pale kreyòl ayisyen.	16. Haitian Creole
<input type="checkbox"/>	अगर आप हिन्दी बोलते या पढ़ सकते हैं तो इस बक्स पर चिह्न लगाएँ।	17. Hindi
<input type="checkbox"/>	Kos lub voj no yog koj paub twm thiab hais lus Hmoob.	18. Hmong
<input type="checkbox"/>	Jelölje meg ezt a kockát, ha megérte vagy beszéli a magyar nyelvet.	19. Hungarian
<input type="checkbox"/>	Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano.	20. Ilocano
<input type="checkbox"/>	Marchi questa casella se legge o parla italiano.	21. Italian
<input type="checkbox"/>	日本語を読んだり、話せる場合はここに印を付けてください。	22. Japanese
<input type="checkbox"/>	한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오.	23. Korean
<input type="checkbox"/>	ໃຫ້ໝາຍໃສ່ຊ່ອງນີ້ ຖ້າທ່ານອ່ານຫຼືປາກພາສາລາວ.	24. Laotian
<input type="checkbox"/>	Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim.	25. Polish

<input type="checkbox"/>	Assinale este quadrado se você lê ou fala português.	26. Portuguese
<input type="checkbox"/>	Însemnați această căsuță dacă citiți sau vorbiți românește.	27. Romanian
<input type="checkbox"/>	Пометьте этот квадратик, если вы читаете или говорите по-русски.	28. Russian
<input type="checkbox"/>	Обележите овај квадратик уколико читате или говорите српски језик.	29. Serbian
<input type="checkbox"/>	Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky.	30. Slovak
<input type="checkbox"/>	Marque esta casilla si lee o habla español.	31. Spanish
<input type="checkbox"/>	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	32. Tagalog
<input type="checkbox"/>	ให้กาเครื่องหมายลงในช่องถ้าท่านอ่านหรือพูดภาษาไทย.	33. Thai
<input type="checkbox"/>	Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga.	34. Tongan
<input type="checkbox"/>	Відмітьте цю клітинку, якщо ви читаете або говорите українською мовою.	35. Ukranian
<input type="checkbox"/>	اگر آپ اردو پڑھتے یا بولتے ہیں تو اس خانے میں نشان لگائیں۔	36. Urdu
<input type="checkbox"/>	Xin đánh dấu vào ô này nếu quý vị biết đọc và nói được Việt Ngữ.	37. Vietnamese
<input type="checkbox"/>	באצייכנט דעם קעסטל אויב איר לייענט אדער רעדט אידיש.	38. Yiddish



PAB

POLICE
ACCOUNTABILITY
BOARD

Language Access Services Grievance Form

Date _____

Customer Name _____

Customer Address _____

Describe the incident below:

Staff Member Name: _____

Please describe what action you would like taken to fix this:

Name of person/group that filled form out _____

Zoom host meetings Guidelines with ASL interpreters

- 1) Make the interpreters co-host so they can spotlight themselves when they switch over.
- 2) Each person should state their name before speaking.
- 3) If we have more than 6 attendees, it is recommended people either remain on camera or stay off, not switch on and off. The reason is that the interpreters can find the speaker easily to let me know who is speaking or signing
- 4) All should be reminded that the interpreters switch every 15 to 20 minutes. The person talking should pause a few seconds to allow the interpreters to switch over. The interpreters will cue them.
- 5) Please use the "raise hand" feature when you'd like to comment – wait until the host calls on you before talking. This allows everyone the same opportunity to participate. Participants' screen will be moved to the upper left-hand corner when using this feature. This will cause a change in the gallery view and participants' view of the interpreter. Please pause when raising or lowering hands to give participants ample time to adjust to the change on the screen.
- 6) Please refrain from vocal interruptions – these ultimately do not provide Deaf and hard of hearing individuals with the same level of access.
- 7) One conversation at a time.
- 8) Can you have interpretation in break-out rooms?
- 9) Language **interpretation cannot be used in break-out rooms**, only the main session of a meeting.
- 10) ASL interpreters would have to be assigned a break-out room where needed. The spotlight feature might not be available during break-out rooms. Pinning is still available.

Difference Pin vs. Spotlight in zoom

Spotlighting:

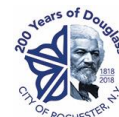
- Only a Host or Co-host can spotlight someone.
Whoever is spotlighted will appear in Speaker View for everyone, even if participants view the meeting in Gallery View.
- No permission is required, either to spotlight or to be spotlighted, be aware at the next meeting you attend; you could have the virtual spotlight shone on you at any time!

Pin Video:

Any participant can pin any other participant's video at any time. (See my caveat above!) No permission is required.

Late Update: February 18, 2022

Guidelines should be reviewed after any update is done by zoom. Any changes to the information above need reflect to these guidelines no later than 24-48 hours from the change or before the next meeting.



Title VI

Non-Employee Discrimination Complaint Form

Complainant's Name _____

Address _____ City _____ Zip _____

Telephone Number(s): _____ E-Mail Address _____

Person who was allegedly discriminated against (*If other than Complainant*):

Name _____

Address _____ City _____ Zip _____

Telephone Number(s): _____ E-Mail Address _____

Identify the protected classification(s) upon which the alleged discrimination is based:

- | | |
|---|---|
| <input type="checkbox"/> Race _____ | <input type="checkbox"/> Color _____ |
| <input type="checkbox"/> Creed _____ | <input type="checkbox"/> National Origin _____ |
| <input type="checkbox"/> Sex _____ | <input type="checkbox"/> Limited English Proficiency (LEP) _____ |
| <input type="checkbox"/> Disability _____ | <input type="checkbox"/> Source of Income _____ |
| <input type="checkbox"/> Age _____ | <input type="checkbox"/> Gender, Gender Identity/Expression _____ |
| <input type="checkbox"/> Marital Status _____ | <input type="checkbox"/> Sexual Orientation _____ |
| <input type="checkbox"/> Retaliation _____ | |

On what date(s) did the alleged discrimination take place? _____

Where did the alleged discrimination take place? _____

Describe the alleged discrimination. What happened and who (name and title if known) you believe was responsible? (*If more space is needed, attach additional documents*): _____



Title VI

Have you filed your complaint with another federal, state, or local agency, or with a federal or state court?

☐ Yes ☐ No

If the answer is yes, check all that apply and include the filed complaint information:

☐ Federal Agency _____ ☐ Federal Court _____

☐ State Agency _____ ☐ State Court _____

☐ Other _____

Complaint information: _____

If you have an Attorney in this matter, please provide the following contact information?

Name _____

Address _____ City _____ Zip _____

Telephone number _____ E-Mail _____

Sign this complaint in the space below. You may attach additional documents or material you believe support your complaint.

Signed _____ Date: _____

Complainant signature

Mail to: Rose M. Nichols
 Title VI Non-Discrimination Coordinator
 City of Rochester Department of Human Resources
 30 Church Street, 103A
 Rochester, New York 14614
 Phone: (585) 428-6509

NOTE: If assistance completing this form is needed, contact the City of Rochester Department of Human Resources by phone at (585) 428-6509 or in person at City Hall, Room 103A, 30 Church Street, Rochester, NY 14614 during normal business hours, Monday through Friday, 9:00 a.m. until 5:00 p.m.



Title VI

Non-Employee Discrimination Complaint Procedure

If you believe you have been excluded from participation in, been denied the benefits of, or been subjected to discrimination, on the basis of race, creed, color, national origin, age, sex, disability, marital status, source of income, gender, gender identity or expression, sexual orientation, or retaliation under any City of Rochester service, program or activity, you may file a discrimination complaint with the City's Non-Discrimination Coordinator (hereinafter Coordinator).¹

This document outlines the complaint procedures relating the City's provisions of programs and services. The Coordinator shall be responsible for the coordination and oversight of these procedures. The Coordinator will receive and review complaints, communicate with complainants and respondents, investigate complaints or arrange for the investigation of complaints, issue letters and notices, and perform other actions necessary to fulfill the City's obligations under nondiscrimination statutes.

If a discrimination complaint about a City program or service cannot be resolved informally, the complainant may file a complaint with the Coordinator using the below procedures.

1. The complaint must be submitted to the Coordinator no later than 180 days after the date of the alleged discrimination.

2. A Non-Employee Discrimination Complaint Form can be obtained by calling 311 or by downloading the form from the City website at: www.cityofrochester.gov. The following information is required on the complaint form, or you may submit a signed written statement that contains all of the following written information:

- a. Your name, address and how to contact you (phone number, email address etc.)
- b. The basis of the alleged discrimination (race, color, sex, national origin, age or disability).
- c. The date or dates on which the alleged discriminatory event or events occurred.
- d. A statement that describes how, why, when and where you believe you were excluded from participation in, were denied the benefits of, or were subjected to discrimination.
- e. Include the location, names and contact information of any witnesses.
- f. If a complaint has been filed with another agency or court, include the agency or court where it was filed with a contact name.
- g. You or your designee must sign your letter of complaint.

3. If the complainant is unable to write a complaint, the Coordinator should be contacted for assistance. The City of Rochester is committed to providing open access to its services to persons with limited ability to speak or understand English; if requested by the complainant, the Coordinator will arrange language translation services.

¹ Applicable federal laws prohibit discrimination on the bases of the protected classes of race, color, national origin (including limited English proficiency), sex, age, and disability. Rochester Municipal Code §63, also includes as protected classes, creed, marital status, source of income, gender, gender identity or expression, and sexual orientation.



Title VI

4. The signed and dated complaint should be sent to the following address:

City of Rochester
Department of Human Resource Management
Attn: Non-Discrimination Coordinator
30 Church Street, Room 103A
Rochester, NY 14614
Telephone: (585) 428-6509
E-mail: Rose.Nichols@cityofrochester.gov

5. A letter acknowledging receipt of the complaint will be issued to the complainant within five (5) business days of its receipt by the Coordinator.
6. If the complaint is outside of the jurisdiction of the City, within ten (10) business days after receipt of the complaint the Coordinator will notify the complainant of the City's lack of jurisdiction to address the complaint. The complainant will be notified of the name and contact information for the appropriate agency with jurisdiction, if known.
7. Complaints, within the City of Rochester's jurisdiction, will be investigated promptly and impartially; a preponderance of the evidence standard will be applied to the complaint investigation. Reasonable measures will be taken to preserve any information that is confidential. At a minimum, the investigation will:
 - a. Identify and review all relevant documents, practices, and procedures.
 - b. Identify and interview persons with knowledge of the alleged discrimination—for example, the person making the complaint, witnesses, or anyone identified by the complainant, anyone who may have been subjected to similar activity, or anyone with relevant information.
8. The Coordinator will review the complaint and may solicit additional information from the complainant. If the additional information is requested and not received within thirty (30) days, the case may be closed. The case may be closed if the complainant no longer wishes to pursue the case.
9. The Coordinator will also provide the respondent(s), such as a subrecipient of federal funds, an opportunity to respond in writing to the allegations in the complaint, along with providing any relevant documents, and names of persons with relevant knowledge.
10. Upon completion of the investigation, the Coordinator will prepare a final report for the Mayor or the Mayor's designee. The investigation process and final report should be completed within 90 days of receipt of the complaint. When a Title VI violation is found to exist, corrective action will be taken immediately. The complainant and respondent will receive a copy of the final report with all required corrective actions.
11. Any person who files a complaint or testifies, assists, or participates in a discrimination complaint investigation, proceeding or hearing may not be intimidated or retaliated against by the City for the purpose of interfering with any right or privilege guaranteed by the Civil Rights Act of 1964, Section 504, or other civil rights statutes.
12. These procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies, or to seek private counsel for complaints alleging discrimination.

Language Access Complaint Form

Police Accountability Board language access policy requires certain public-facing agencies to offer interpretation services in any language and to translate important documents into at least the top ten 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 complaint form using the contact information provided above. **All personal information in your complaint will be kept confidential.**

1. Complainant: First name: _____ Last name: _____ Zip code: _____ <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> Preferred language(s): _____ Phone number: _____ E-mail address: _____ Is someone else helping you file this complaint? <input type="checkbox"/> No <input type="checkbox"/> Yes If 'Yes,' include their contact information: First name: _____ Last name: _____ E-mail address and/or phone number: _____
2. What language(s) did you need services in?
3. What was the problem? 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) _____
4. When did this incident happen? If it happened more than once, indicate the date of the most recent incident. Date (MM/DD/YYYY): _____ Time: _____ <input type="checkbox"/> AM <input type="checkbox"/> PM Where did this incident happen? <input type="checkbox"/> Over the phone <input type="checkbox"/> In-person Provide address: _____
5. Describe what happened. 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.
6. Did you complain to anyone from the PAB staff? If yes, include who you spoke with and what their response was. Please be specific.
Print Name: _____ Date (MM/DD/YYYY): _____ (Person making the complaint)