

**SUFFOLK COUNTY HUMAN RIGHTS COMMISSION**  
**LANGUAGE ACCESS PLAN FOR LEP INDIVIDUALS**

**Designee: Lorena Gonzalez**

**I. PURPOSE**

The Suffolk County Human Rights Commission (“SCHRC”) recognizes the importance of effective and accurate communication between its personnel and the community that it serves. This Language Access Plan sets forth the actions we will take to ensure that persons with limited English proficiency (“LEP”) have meaningful access to agency services, programs and activities.

**II. POLICY**

The SCHRC’s policy is to take reasonable steps to provide timely and meaningful access to LEP persons to the services and benefits the SCHRC provides. All SCHRC personnel shall provide free language assistance services to LEP individuals whom they encounter or whenever an LEP individual requests language assistance services. SCHRC personnel will inform members of the public that language assistance services are available free of charge to LEP persons and that SCHRC personnel will provide these services for them. Use of language services shall not be deemed by any SCHRC employee as a basis for inquiring into confidential information relating to immigration status or other personal or private attributes. No SCHRC employee shall inquire about or disclose confidential information, including, but not limited to, immigration status, unless such inquiry or disclosure is required by law. It is SCHRC’s policy that minors will not be used as interpreters.

**III. DEFINITIONS**

- A. Primary Language means an individual’s native tongue or the language in which an individual most effectively communicates. The SCHRC personnel will make every effort to ascertain an individual’s primary language to ensure effective communication.
  
- B. Limited English Proficiency designates individuals whose primary language is not English and who have a limited ability to read, write, speak or understand English. LEP individuals may be competent in certain types of communication (*e.g.*, speaking or understanding), but still be LEP for other purposes (*e.g.*, reading or writing). Similarly, LEP designations are context-specific: an individual may possess sufficient English language skills to function in one setting, but these skills may be insufficient in other situations.

- C. Interpretation is the act of listening to a communication in one language (source language) and orally converting it to another language (target language) while retaining the same meaning.
- D. Translation is the replacement of written text from one language (source language) into an equivalent written text in another language (target language).
- E. Vital Documents including essential public documents means those documents most commonly distributed to the public that contain or elicit important and necessary information regarding the provision of basic SCHRC services. The SCHRC has identified the following vital documents to be translated into the 6 most spoken languages by LEP individuals in Suffolk County:  
Intake forms (for employment, police, housing, etc.)  
Informational flyers
- F. Language Access Coordinator (“LAC”) is responsible for devising and ensuring that the agency adheres to its language access policy directives, plan and procedures to provide meaningful access to LEP persons.

#### **IV. PROCEDURES FOR ACCESSING INTERPRETATION SERVICES**

All SCHRC employees will receive training on how to access an interpreter using the telephone. For LEP individuals that speak Spanish, Spanish language staff are responsible for communicating with the individual and informing her/him that free language assistance is available. When no Spanish language staff are available or when the foreign language spoken is not Spanish, staff will be authorized to access telephone interpretation services. There is a designated area in the office where a confidential conversation with SCHRC staff can be conducted. This area will be equipped with speaker telephones, which will enable employees to access competent interpreters using private vendors.

#### **V. PROCEDURES FOR ACCESSING DOCUMENT TRANSLATION SERVICES**

- A. Identification and Translation of Vital Documents: The SCHRC’s Executive Director or her designee shall be the LAC and will be responsible for classifying all documents as vital or non-vital, and determining into what languages the vital documents should be translated. The LAC will be responsible for having the documents translated and distributed to LEP individuals as well as for having documents received from LEP individuals in a language other than English, translated into English.

- B. Translation of Investigative Documents: Should an investigator need a note, letter, or other document translated for an investigation, a memorandum will be forwarded to the LAC, with a *copy* of the original note, letter or other document to be translated. The request should indicate if the translation is needed immediately; otherwise, the request should specify the date required. The LAC will then have the documents translated by a competent translation service and distributed to the LEP individual.

The following checked off documents are currently translated by the agency in the languages indicated:

Document Name	Languages					
	Spanish	Italian	Mandarin	Haitian Creole	Portuguese	Polish
Short Intake Form	✓		✓			
Police Intake Form	✓	✓	✓	✓		
Know Your Rights Flyer	✓	✓	✓	✓		
Housing Flyer	✓	✓	✓	✓		

## VI. NOTIFYING THE PUBLIC ABOUT LANGUAGE SERVICES

- A. Signage: At the SCHRC's entry point or lobby, signage shall be posted in Suffolk County's 6 most commonly spoken languages stating that interpreters are available free of charge to LEP individuals.
- B. Outreach: Presentations will be conducted at schools, faith-based groups, and other community organizations and will include information that language access services are available, free of charge.
- C. Website: Notification will be posted on the SCHRC website about the availability of language access services, free of charge.

## VII. STAFF TRAINING

- A. Mandatory staff training will be held once a year or more often, as needed. The staff training will include the following components:

1. The legal obligation to provide meaningful access to benefits and services to LEP individuals;
  2. How to access language assistance services;
  3. How to work with interpreters;
  4. Cultural competence and cultural sensitivity;
  5. Documenting the language needs of LEP individuals and the language services provided to them by the agency; and
  6. How to obtain written translation services.
- B. The methods and frequency of training are as follows:
1. Periodic memoranda with information about policy and resources;
  2. Annual Policy review for all staff;
  3. Small group training (mostly receptionists and those that communicate and interact with the public); and
  4. Training on Executive Order No. 10-2012, Countywide Language Access Policy, and the Language Line Services for all staff.

## **VIII. MONITORING**

The LAC will monitor the agency's compliance with Executive Order No. 10-2012 by annually collecting data on the provision of language assistance services, the availability of translated materials, whether signage is properly posted, and any other relevant measures.

The LAC of the SCHRC will be responsible for annually reviewing all new documents issued by the SCHRC to assess whether they should be considered vital documents and be translated.

The SCHRC will consult with community-based organizations and conduct an internal review in order to assess the efficacy of its program.

## **IX. COMPLAINT PROCESS**

The SCHRC will display signage in its public areas and information on its website indicating the process for filing a complaint with the agency and with the Office of Civil Rights when the individual is not satisfied with the quality or availability of the SCHRC's language access services. A standard complaint form will be made available in the 6 most commonly spoken languages in the SCHRC's public reception areas and its website (see attached form).