Office of Public Integrity
Language Access Plan

Janson D. McNair
Director
Office of Public Integrity

Jesus Paesch
Language Access Compliance Coordinator
(585)-753-2408
languageaccess@monroecounty.gov

45 Exchange Boulevard, Rochester, New York 14614 (585) 753-3105
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Introduction

The Office of Public Integrity (OPI) promotes and defends the integrity, efficiency and accountability of Monroe County and its operations. The office identifies and investigates allegations of waste, fraud and abuse by County employees, as well as outside vendors conducting business with the County. The purpose of this task is to promote an atmosphere of honesty and integrity within County government.

The Office of Public Integrity has the ability to examine all County operations independently and report its findings to law enforcement, when necessary. The office addresses concerns raised through the Whistleblower Hotline, which is accessible to all County employees, as well as County residents. The Director has the authority to subpoena witnesses, administer oaths or affirmations, take testimony and compel the production of documents deemed to be relevant by the Director for any inquiry or investigation. The Office of Public Integrity will provide interpreting and translation services free to its constituents upon request.

This Language Access Plan is intended to comply with Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000, et seq., as well as its implementing regulations set forth at 45 c.f.r. Part 80, Title I of the Americans with Disabilities Act (ADA).

Questions regarding this policy and its implementation should be directed to the Monroe County Language Access Compliance Coordinator:

Jesus Paesch
Language Access Compliance Coordinator
50 West Main Street
Rochester, NY 14614
(585)-753-2408
languageaccess@monroecounty.gov
ASSESSING LIMITED ENGLISH PROFICIENT POPULATION LANGUAGE NEEDS

According to the United States Census Bureau the most common languages spoken by Limited English Proficient (LEP) individuals served by Monroe County, or potentially served, are listed below.

<table>
<thead>
<tr>
<th>Languages</th>
<th>Estimated LEP Individuals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spanish</td>
<td>41.90%</td>
</tr>
<tr>
<td>Italian</td>
<td>6.70%</td>
</tr>
<tr>
<td>Arabic</td>
<td>5.48%</td>
</tr>
<tr>
<td>Nepali, Marathi, or other Indic Languages</td>
<td>5.02%</td>
</tr>
<tr>
<td>Chinese (Including Mandarin, Cantonese)</td>
<td>4.35%</td>
</tr>
<tr>
<td>Russian</td>
<td>3.65%</td>
</tr>
<tr>
<td>French (Including Cajun)</td>
<td>3.24%</td>
</tr>
<tr>
<td>Other Languages of Asia</td>
<td>2.72%</td>
</tr>
<tr>
<td>Vietnamese</td>
<td>2.54%</td>
</tr>
</tbody>
</table>

Source: U.S. Census Bureau

**Process Implementation**
The Office of Public Integrity will take reasonable steps to provide language assistance to Limited English Proficient (LEP) individuals. The Director of the office will allocate financial resources that will only be used for language access and ensure that staff has the resources necessary to provide meaningful language access.

<table>
<thead>
<tr>
<th>Department</th>
<th>Funds allocated for Language Access</th>
</tr>
</thead>
<tbody>
<tr>
<td>Monroe County Office of Public Integrity</td>
<td>$100</td>
</tr>
</tbody>
</table>

**Appointments & Reporting an Allegation**
If you are planning to attend an upcoming appointment or want to report an allegation but need a language access accommodation to participate fully, please fill out a language access request form. The office can arrange reasonable accommodations for assistance in a language other than English with advance notice of at least fourteen business days.
To submit a language access request, go to the Monroe County language access website at https://www.monroecounty.gov/dei-language. After submitting your request, Monroe County personnel will confirm your appointment in 5-7 business days after the request is submitted. The Office of Public Integrity will use qualified personnel to provide in-person, virtual, or telephonic interpreting.

All staff are expected to abide by the following guidelines when interacting with LEP persons:

- Staff must remember to converse with the clients, not the interpreter. They will direct their words and eye contact toward the customer.
- Be patient. Providing service across a language barrier takes time.
- Avoid abbreviations, slang, jargon, and acronyms whenever possible. Use the most straightforward and precise language possible to describe internal concepts, policies, and processes.
- Speak slowly and in relatively short segments and pause so the interpreter can interpret.
- Ask clients to repeat important information to ensure understanding is understood.
- Be mindful not to patronize the customer and will not treat a Limited English Proficient customer with less respect than any other customer.
- Do not refuse to serve someone because they are uncomfortable or want to use the interpreting services.
- Always acknowledge the interpreter as a professional in communication. Respect their role and give the interpreter time to restructure their minds to present it in a culturally and linguistically manner.
- Staff will not hold the interpreter responsible for what the client says or doesn’t say. The interpreter is the medium, not the source, of the message.
- All new hires must review this Language Access Plan.

Monitoring and Updating of the Plan
The Monroe County Language Access Compliance Coordinator will work closely with the Language Access liaison of the Office of Public Integrity to evaluate and monitor the Language Access Plan. The evaluation ensures that the scope and nature of language services reflect updated information.

Periodic inspections will examine the following issues:
- Changes in the demographics of Limited English Proficient persons in Monroe County
- Review the data of interpreting and translation services provided
- An assessment of the existing language assistance services meets the needs of LEP individuals
Complaint Procedure
We believe in a transparent process to serve the community. Thus, stakeholders have the right to file a complaint if they believe they have not been provided with adequate language access services.

An example of why stakeholders may want to submit a complaint is when the person feels that they have not been provided with adequate language access, for example, when a language access request was not fulfilled or if a stakeholder experienced difficulties communicating with the interpreter.

Complaints may be made directly to the Language Access Compliance Coordinator. The Language Access Compliance Coordinator will be responsible for receiving, addressing, and resolving all complaints. Complaints are accepted in writing or verbally. The complaint should include the following information: name of the person filing the complaint, nature of the complaint, name of persons responsible for the alleged incident, requested solution or corrective action, and name of any person or group assisting in filling the complaint.

To file a complaint, you must visit the Monroe County Diversity Equity and Inclusion website at https://www.monroecounty.gov/dei-language or by calling 585-753-2408.

Once a complaint has been submitted, the Language Access Compliance Coordinator will confirm within 5-7 business days that the complaint has been received. The complaint will be reviewed, and an investigation will be conducted. The complainant will receive full attention and will be addressed within 40 business days. The complainant will be notified of the findings and all necessary resolutions.
Monroe County Office of Public Integrity
Language Access Plan

Language Access Plan authorized by:

David C. Scott
Chief Diversity Officer
585-753-2400

Language Access Plan prepared by:

Jesus Paesch
Language Access Compliance Coordinator
585-753-2408

Language Access Plan read and approved by:

Janson D. McNair
Director, Office of Public Integrity