



LANGUAGE ASSISTANCE REPORT

2020

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30 Yaphank Avenue, Yaphank, New York 11980
Prepared by the Office of the Police Commissioner

A Message from the Language Access Coordinator

Thank you for taking an interest in the Suffolk County Police Department's Language Access Program. This past year has presented all of us with unique and significant challenges. While the delivery of police services was never interrupted, some of the Department's operations were affected by the pandemic. I am happy to report that the provision of language assistance was not among them. In 2020 we recorded another significant increase in the number of interpretations provided to 911 callers with limited English proficiency.

The Department created the position of Language Access Coordinator (LAC) in 2014 as part of a negotiated Settlement Agreement with the United States Department of Justice.¹ As LAC, I am tasked to engage in policy development and strategic planning regarding the provision of language access services to persons with limited English proficiency (LEP). I am also the custodian of the Department's Language Access Plan and oversee all aspects of its creation, maintenance and implementation.

The LEP landscape in Suffolk County is dominated by Spanish-language speakers. Data from 2018 indicates that about 14% of the County's population speaks Spanish at home.² Mandarin, Cantonese, and Italian are the next most prevalent, but each represent less than 1% of the total population.

Languages Spoken at Home



While these figures are somewhat dated, our experience over the past year continues to bear out the fact that Spanish is by far the most prevalent non-English language encountered by our personnel.

¹ https://suffolkpd.org/Portals/59/scpd_pdfs/infoandpolicies/DOJAgreement.pdf

² DataUSA. (2018). Suffolk County, NY-Diversity-Non-English Speakers. Retrieved from <https://datausa.io/profile/geo/suffolk-county-ny>

As we begin a new year, and hopefully put the pandemic behind us, I look forward to increasing our numbers of bilingual employees and certified interpreters, and continuing the work we are doing to make sure everyone has access to the services they need.

Lieutenant Paul Bowden
Commanding Officer
Community Relations Bureau

The Language Access Plan

The Department first issued a Language Access Plan (LAP) in 2013 at the direction of Suffolk County Executive Order #10-2012. After entering into a Settlement Agreement with the U.S. Department of Justice (DOJ), that plan was expanded and then adopted into the Department's Rules and Procedures.³ In its present form the LAP:

- Informs the public of all language assistance services available to them
- Explains how LEP populations are identified and served
- Details the responsibilities of each level of command in providing language assistance services
- Gives precise instruction to line officers regarding when and how to provide language assistance services
- Establishes robust audit and compliance protocols
- Outlines language training curricula and the process of language skills certification

The LAP is a living document that adapts to the ever-changing needs and demographics of the Police District. It is designed to allow flexibility in the deployment of language assistance services while simultaneously requiring strict adherence to protocols regarding the delivery of those services. It serves as a central reference for all issues related to language access for both the Department and the public.⁴

The LAP is available on the Department's website in seven languages.⁵ It is reviewed and updated every Fall and re-issued the following Spring. Additions to the policy made in 2020 include:

- Adoption of a Precinct-level audit procedure of all services rendered to 911 callers based upon quarterly LIMA Reports;
- A strict prohibition against using children as interpreters unless no other option is available in an emergency situation;

³ Suffolk County Police Department Rules and Procedures Chapter 26, §5.

⁴ The U.S. DOJ has characterized the LAP as a strong, comprehensive and solid policy

https://suffolkpd.org/Portals/59/scpd_pdfs/infoandpolicies/DOJCompliance1_19_2017.pdf

⁵ <https://suffolkpd.org/Home/LanguageAccessPlaninMultipleLanguages.aspx>

A requirement that statements taken from LEP individuals are read back in the individual's primary language.

The LAP was also integrated into the Department's new on-line policy and procedure platform, Lexipol®, in late 2020, and it now resides in Policy 333 "Limited English Proficiency Services". As the Department transitions to a new web portal in 2021 this policy will be translated and posted in their new format.

Translation of Vital Documents

Since the inception of the LAP, the Department has identified certain documents within its system of records as "vital". These are documents which convey information of legal significance, without which core police service cannot be effectively rendered.

Vital Documents include forms such as "Family Offense Assistance & Court Procedures" (PDCS-7109p); "How to obtain a Police Report" (PDCS-8100i); and "Crime Victim Information Report" (PDCS-8105b). Also designated 'vital' are many policies, procedures and informational materials such as "Arrest of Non-U.S. Citizens and Persons with Dual Citizenship Procedure" (Rules and Procedures Chapter 16, §4⁶); "Hate Crimes" (Rules and Procedures Chapter 24, §6⁷); and the "Suffolk County Traffic and Parking Violations Bureau" informational pamphlet. In addition to these documents, other materials are also translated and provided to LEP individuals and communities according to need.

Twelve forms are currently available in multiple languages⁸, and over 40 documents, policies and guides are available in Spanish.⁹

Community Awareness

The Department conducts many education and awareness programs about language assistance services throughout the County every year. Most programs are delivered locally at venues such as churches, schools, libraries, police facilities, and advocacy centers. These programs inform members of the LEP community where and how they can engage the police in whatever language they are most comfortable using. Bilingual

⁶ Lexipol "Immigration Status" 414.

⁷ Lexipol "Hate Crimes and Incidents" 319

⁸ <https://suffolkpd.org/FormsandReports.aspx>

⁹ <https://suffolkpd.org/Home/informacionenespanol.aspx>

Department members and telephonic interpretation services are available at all of these events. During 2020 some of these meetings were held entirely in Spanish.

In addition to live presentations, the Department disseminates print media throughout the County describing its language access resources. For example, members of the Community Relations Bureau distribute a five point “Did You Know” post card which highlights an individual’s right to language services, and notifies them that a request for language services will not result in any inquiries about their immigration status.

The Department has also increased its outreach via social media and has grown the followership of its Spanish language Facebook page to over 4000.¹⁰ The LAC and CRB also meet regularly with advocates and community groups to solicit a broad range of information, including the availability and quality of language assistance. To identify emerging language populations, the LAC also tracks information collected by the United States Census Bureau, local school districts and the Department’s own records of Language Line usage.

Language Proficiency Certification

Personnel assigned to CRB facilitate the certification of all Department Authorized Interpreters (DAI), and Bilingual Officers through Language Line Solutions. To date, the Department has certified forty-two (42) DAIs¹¹, and one hundred and fifty-one (151) sworn Bilingual Members.¹²

In addition to In-Service certifications, the Department has also hired a total of seventy-nine (79) police officers from the Spanish-Speaking civil service list since 2013, comprising just over 10% of all new hires. The Department anticipates hiring between 5-10 officers from the Spanish-speaking list in 2021, depending upon the number of personnel hired.

Language Assistance Tracking Database

The Language Assistance Tracking Database (LATD) is the repository for all language assistance records maintained by the Department. It began as a storage database in 2014 and has been fully integrated into the Online Reporting System/Incident Reporting System for several years. The Precinct-level oversight program, is based upon data

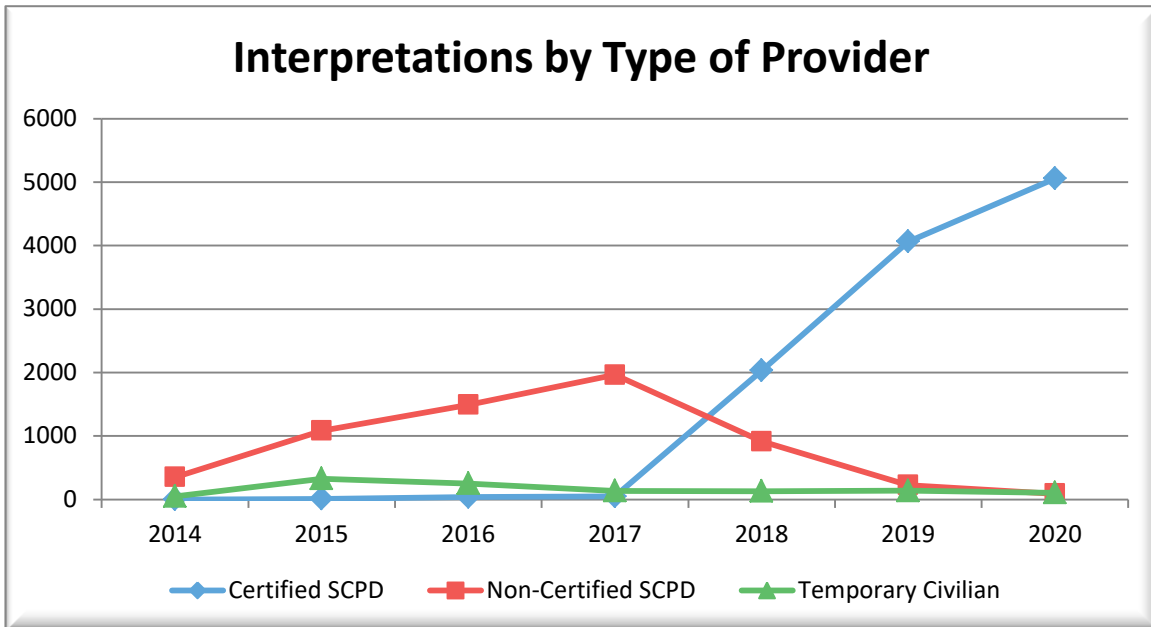
¹⁰ <https://www.facebook.com/SuffolkPDEspanol/>

¹¹ All in Spanish

¹² 140 Spanish, 4 Polish, 1 Portuguese, 1 Italian, 2 Mandarin, 1 Turkish, 1 Hindi and 1 Russian

stored in the LATD and it provides Precinct commanders information about compliance down to the granular level.

Information in the database also provides valuable perspective on the type and usage of language services throughout the Department. For example, the visualization below is built on a pull from the database, and displays the success the Department has achieved in providing quality, in-person interpretations.



How Language Assistance is Provided

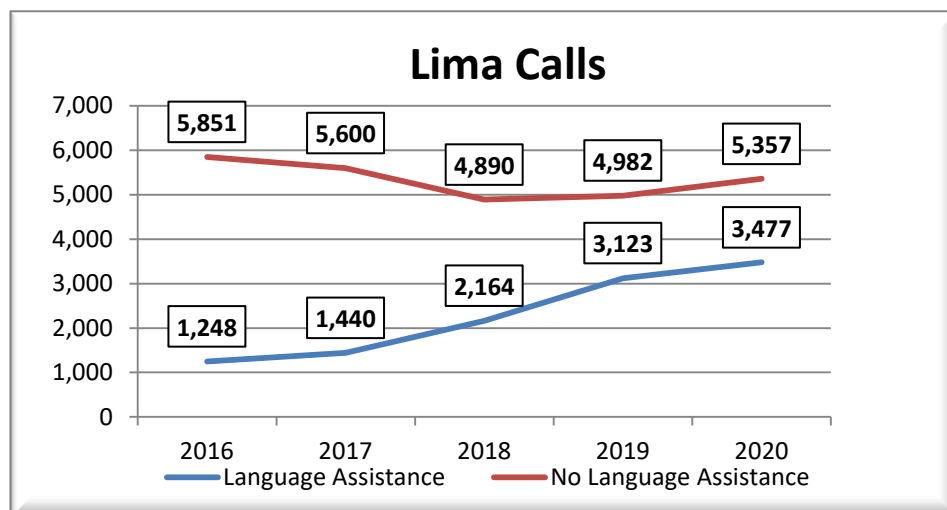
When 911 call-takers have any difficulty communicating with a caller, they immediately attempt to determine if a language barrier exists, and if so, what language the caller is speaking. As noted above, in Suffolk County the overwhelming number of LEP individuals use Spanish as their primary language. For that reason the Department employs 10 Spanish-speaking Emergency Complaint Operators (ECO) in its 911 center. When these interpreters are off, or handling other calls, English-speaking ECOs utilize Language Line.

If language assistance is rendered by an ECO, the incident is designated with an “L” before it is dispatched to patrol officers. In the phonetic alphabet “L” is sounded out as “LIMA”, hence these calls for service are referred to as “LIMA calls”. It is important to note that not every phone call placed to 911 results in a dispatched call for service. Certain incidents, such as traffic accidents, structure fires, loud and/or large disputes and fireworks can generate many duplicate calls from passersby. These duplicate calls

are all combined (“voided”) into a single incident number which is then dispatched to officers in the field. None of the duplicate calls that are designated “LIMA” before they are voided receive any language assistance, which can skew the analysis of the provision of interpretation services.

All dispatched calls are broadcast over the police radio system and simultaneously sent to the assigned officer’s mobile computer. Whenever an officer receives a LIMA call, that officer, along with every other officer and supervisor listening to the same radio channel, becomes aware that the call might require language assistance. When the responding officer arrives on scene he or she determines exactly what assistance is required. Frequently, calls which are designated LIMA by the 911 ECO, do not in fact require any language assistance when the officer arrives on scene. This occurs for a variety of reasons. Persons calling 911 are often in severe distress, and even those who have command of the English language may default to their native tongue. ECOs also tend to err on the side of caution and designate calls as “LIMA” whenever they encounter any hesitancy in a caller’s English. At the scene, the party requiring police service is sometimes not the LEP person who called 911. Also, it is not uncommon for 911 callers, LEP included, to leave the scene altogether before an officer arrives. Finally, requests for medical assistance (“Aided Cases”) which are dispatched as LIMA calls do not require language assistance in the field unless the responding officer must provide police services.¹³

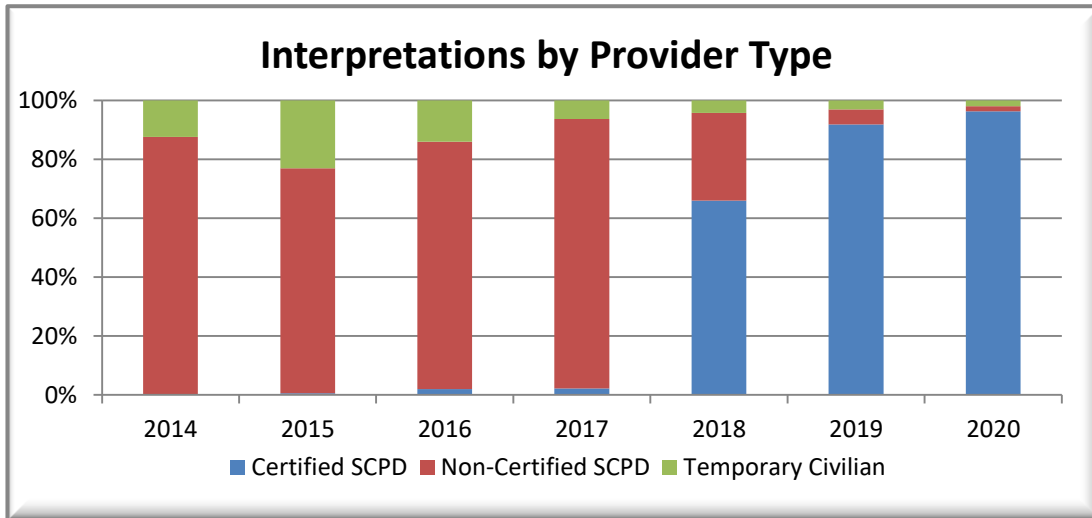
In 2020 approximately 8,834 LIMA calls were dispatched by the 911 call center.¹⁴ Of those calls, approximately 3,477 involved the delivery of some form of language assistance.



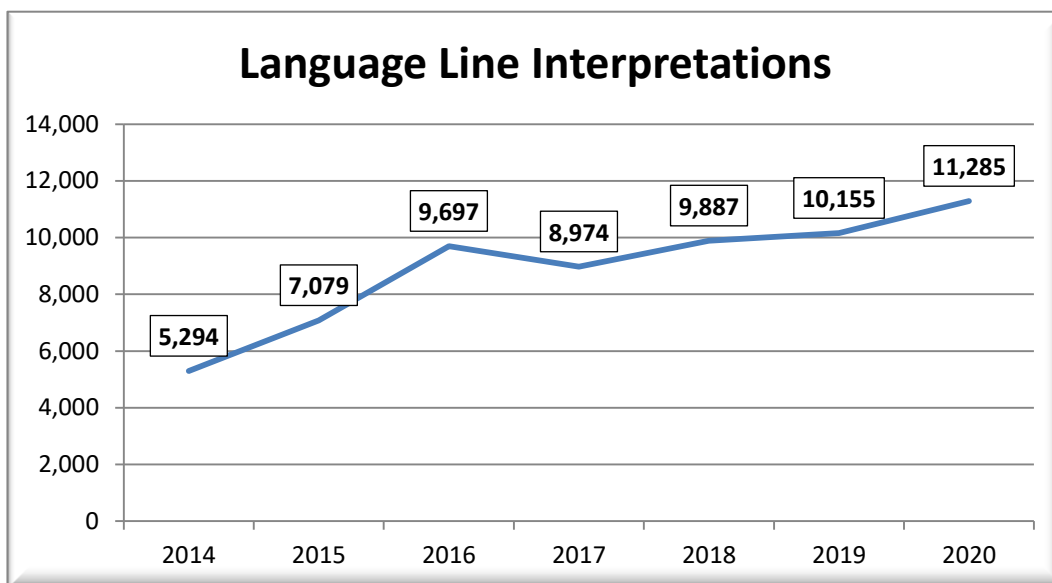
¹³ Police units are dispatched with Fire and Rescue units simultaneously on aided calls to ensure rapid response.

¹⁴ These figures represent calls pulled from the CAD (E911) database and exclude approximately 300 entries with insufficient identifying details.

Officers delivering language assistance seek in-person interpreters first as a matter of policy. As the number of certified officers has increased, the use of non-certified persons, both police personnel and civilians, has dramatically decreased. In 2020 approximately 5056 of the 5252 in-person interpretations recorded were performed by certified personnel.



The increase in certified in-person interpretations was accompanied by an increase in Language Line usage in 2020, with over 11,000 recorded Department-wide.¹⁵



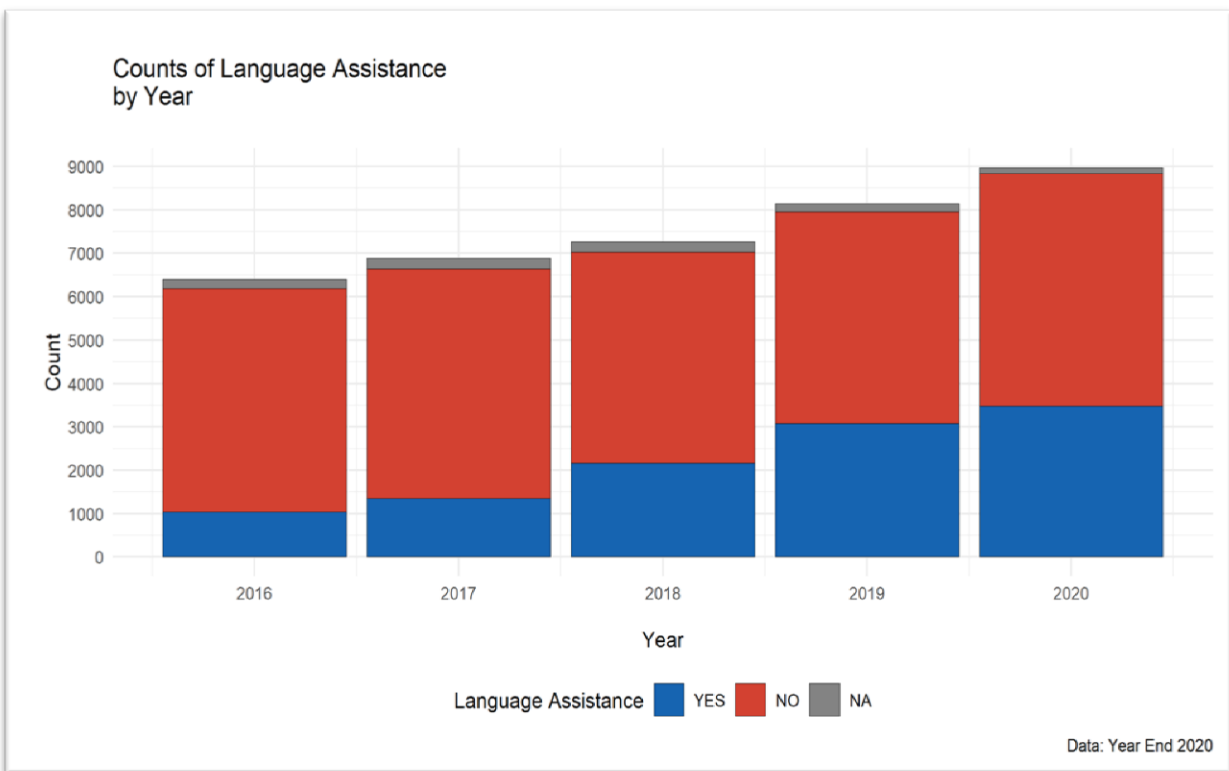
¹⁵ Language Line statistics have significant overlap with in-person interpretation numbers because of the use of Language Line services in the E911 center.

Monitoring the Delivery of Services

After the interpretation protocols were firmly set in place and the certification of personnel was underway, the Department began to look at compliance statistics. In 2018 the Commissioner's Office, with assistance from the Language Access Coordinator, authored the first "LIMA Reports" using data culled from the LATD. These reports were sent to the command staff at each Precinct and informed supervisors of their unit's overall compliance compared to other units and the Department as a whole. During 2018 the reports were expanded to include information identifying individual officers and specific reasons for which language services were not rendered. Finally, a methodology developed in one Precinct was deployed Department-wide in 2019, and then incorporated into official policy in the 2019 and 2020 updates to the LAP.¹⁶

Oversight protocols now require the Precinct commanding officer (CO), or designee, to report to the Chief of Patrol and explain the measures taken to address any deficiencies identified in the LIMA Reports.

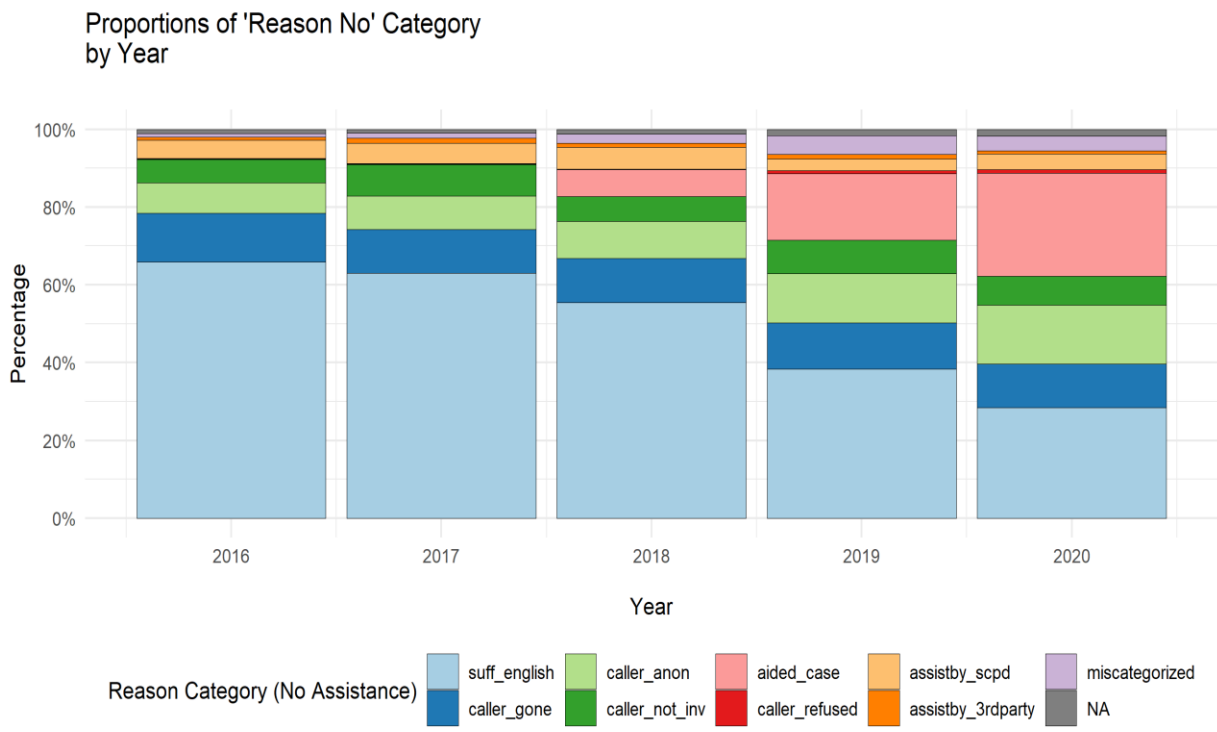
These new oversight efforts have had a demonstrable effect on the reporting of language assistance.



¹⁶ :Lexipol, "Limited English Proficiency Services", 333.

In 2021 the oversight process will be further enhanced by the creation of data ‘dashboards’. Already in use for tracking and monitoring Hate Crimes, the dashboard platform will allow Precinct commanders to view language statistics in near real-time, and will obviate the need for static LIMA Reports. The options available on the dashboard will also allow them to construct their own unique visualizations and compare information beyond that which was included in the LIMA Reports. For example, a CO may wish to compare all officers assigned to a certain zone over a given period of time, or instead, compare officers in a particular sector to those in an entire zone. Such functionality will provide much greater insight than the limited scope of the static reports.

In 2020, as in past years, the analysis of LIMA calls was focused on the reasons given by officers for not providing language assistance. As discussed above, many factors come into play between the 911 call center labeling a LIMA call and the officer in the field providing service. When reporting began, approximately 60% of the “no’s” were categorized as “Complainant Spoke Sufficient English”. Although a valid reason for not rendering language assistance, this justification can be viewed as a suspect response given its broad parameters. As the reporting process became more exacting, and as more members received training, the use of this reason decreased dramatically. By 2020 it dropped to approximately 30%. A 50% decrease from its 2016 high.



Data: Year End 2020

As encouraging as this compliance trend is, the Department still conducts random audits of LIMA calls to determine the validity of “no” responses. The audits are performed by an investigator assigned to the Internal Affairs Bureau who is a certified

DAI in Spanish. The investigator contacts complainants directly and interviews them about the service they received and the responding officer's conduct. The investigator then reviews the officer's documentation of the LIMA call, and determines whether or not the officer's actions were in compliance with policy and protocol.

The audit process is labor-intensive and multiple calls are routinely necessary to reach a single complainant who is willing to participate. In 2019 roughly 8-10 complainants were reached each month. The first quarter of 2020 yielded similar results, but Covid resulted in the process being suspended in March. It resumed in September and will continue in 2021 uninterrupted.

In total, 54 LIMA call complainants were reached in 2020. Officers on 43 of those calls were found in compliance with language assistance protocols and policy. Of the 11 who were not, all were counseled by their command and received re-training.



2021 Language Assistance Goals

As in past years, the goal for 2021 is increasing compliance with language assistance protocols throughout the Department. The most important facet of compliance is, of course, getting people an interpreter when they need one. The Department's ability to assess this, however, is mostly reliant upon its officers' compliance with reporting protocols.

With more sophisticated information systems at its disposal, such as the dashboard data platform, the Department will be able to increase its awareness of operational effectiveness, and in turn make the provision of services more efficient.

