

Broward Sheriff's Office Limited English Proficiency Plan



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Table of Contents

I.	Introduction.....	3
	A. Plan Summary.....	3
	B. Definitions.....	4
II.	Meaningful Access: Four Factor Analysis.....	5-8
III.	Language Assistance	
	A. Oral Language Assistance.....	9
	B. Translations of Materials.....	10
IV.	Notifying LEP Persons.....	10
V.	LEP Training for Agency Employees	11
VI.	Plan Monitoring.....	11
VII.	Plan Dissemination	12

I. Introduction

It is the policy of the Broward Sheriff's Office (BSO) to ensure that persons with Limited English Proficiencies (LEP) not be discriminated against nor denied meaningful access to, and participation in, the programs and services provided by the Agency. In order to ensure meaningful access and participation for LEP persons, All BSO staff shall notify such persons that language services are available to them at no cost and shall take reasonable steps to see that language services are provided according to the provisions of the Broward Sheriff's Office LEP Plan and Policies as described below.

The LEP Plan and Policies that follows is in compliance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d et seq., which prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance, and in compliance with the Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" requiring Federal agencies to examine the services they provide, identify any need for services to those with limited English proficiency (LEP), and develop and implement a system to provide those services so LEP persons can have meaningful access to them. It is expected that agency plans will provide for such meaningful access consistent with, and without unduly burdening, the fundamental mission of the agency. The Executive Order also requires that the Federal agencies work to ensure that recipients of Federal financial assistance provide meaningful access to their LEP applicants and beneficiaries.

A. Plan Summary:

The Broward Sheriff's Office has developed this Limited English Proficiency Plan to help identify reasonable steps for providing language assistance to Limited English Proficiency (LEP) persons who wishes to access services provided by the BSO. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English.

This plan outlines how the BSO will identify a person who may need language assistance, the ways in which assistance may be provided, staff training that will be conducted, and how to notify LEP persons that assistance is available.

In order to prepare this plan, the Broward Sheriff's Office used the four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served by the Broward Sheriff's Office.
2. The frequency with which LEP persons come in contact with Broward Sheriff's Office services.
3. The nature and importance of the program, activity, or services provided by the Broward Sheriff's Office to the LEP population.
4. The resources available and cost to the recipient.

A summary of the results of the four-factor analysis is outlined in the plan below.

B. Definitions:

Limited English Proficient (LEP) Individuals:

Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English. LEP individuals may be competent in English for certain types of communication (e.g., speaking or understanding), but still be LEP for other purposes (e.g., reading or writing).

Primary Language:

An individual's primary language is the language in which the individual most effectively communicates.

Interpretation:

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.

Translation:

The replacement of written text from one language (source language) into an equivalent written text in another language (target language).

Vital Document:

Paper or electronic written material that contains information that is critical for accessing the Commission's programs or activities, or is required by law.

Meaningful Access:

Language assistance that results in accurate, timely, and effective communication at no cost to the LEP individual. For LEP individuals, meaningful access denotes access that is not significantly restricted, delayed, or inferior compared to programs or services provided to English proficient individuals.

Four-Factor Assessment:

This is an assessment tool used by the Recipient of federal funding to determine the extent of its obligation to provide LEP services. These four factors are: (1) The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee; (2) the frequency with which LEP persons come into contact with the program; (3) the nature and importance of the program, activity, or service provided the program to people's lives; and (4) the resources available to the grantee/recipient and costs.

II. Meaningful Access: Four Factor Analysis

A) The number or proportion of LEP persons in the service area who may be served by Broward Sheriff's Office.

The Broward Sheriff's Office will assess the language needs of the population that it serves. To identify the language and number of LEP persons the BSO may encounter, the following data will be reviewed:

- US Census Data/ Year 2010
- Community Agency Data
- Interviews with BSO employees to determine frequency of contacts with LEP persons and what languages encountered.

The first step toward understanding the profile of the individuals that could participate in the BSO process is a review of the US Census Data.

US Census Data:

Demographics of the Broward County Area:

According to the 2010 US Census Data, the total population of Broward County is 1,748,066 which represent 7.70% more than the 2000 statistical results. In the Population by Race, from 2000 to 2010 Asians had the highest population growth of 55.26%, Blacks or African American Alone had a growth of 40.27%, and American Indian and Alaska native had a growth of 30.98%. The population growth from 2000 to 2010 also showed a 33% growth in the race category of "some other race alone". In the Population by Hispanic or Latino Origin (of any race) Persons of Hispanic or Latino Origin had the highest population growth from 2000 to 2010 at 61.33%.

As of 2010, 32% of Broward residents were foreign born (including naturalized American citizens.) Haitians made up the largest population of immigrants, with Jamaicans coming in second, Colombians in third, followed by Cuban exiled refugees in fourth place, then Peruvians, Venezuelans, Brazilians, Dominicans, Canadians, and Mexicans being the tenth highest group of expatriates.

As of 2010, 63.44% of all residents spoke English as their first language, while 22.22% spoke Spanish, 5.42% French Creole (mostly Haitian Creole,) 1.48% Portuguese, 1.41% French, and 0.59% of the population spoke Italian as their mother language. In total, 36.56% of the population spoke languages other than English as their primary language.

The BSO will continue to monitor the release of census data as it becomes available to adjust the implementation of this LEP plan as needed and/or required.

See Table I below for additional population/race statistics on Broward County:

Table I:

<u>Race</u>	<u>Number</u>	<u>Percent</u>
Total population	1,748,066	100.0
One Race	1,697,215	97.1
White	1,102,231	63.1
Black or African American	467,519	26.7
American Indian and Alaska Native	5,065	0.3
Asian	56,795	3.2
Asian Indian	21,584	1.2
Chinese	11,058	0.6
Filipino	6,520	0.4
Japanese	1,167	0.1
<u>Race</u>	<u>Number</u>	<u>Percent</u>
Vietnamese	4,972	0.3
Other Asian [1]	8,951	0.5
Native Hawaiian and Other Pacific Islander	911	0.1
Native Hawaiian	180	0.0
Guamanian or Chamorro	186	0.0
Samoan	73	0.0
Other Pacific Islander [2]	472	0.0
Some Other Race	64,694	3.7
Two or More Races	50,851	2.9
White; American Indian and Alaska Native [3]	2,451	0.1
White; Asian [3]	6,070	0.3
White; Black or African American [3]	10,955	0.6
White; Some Other Race [3]	12,804	0.7
Race alone or in combination with one or more other races: [4]		
White	1,137,977	65.1
Black or African American	492,887	28.2
American Indian and Alaska Native	10,832	0.6
Asian	70,826	4.1
Some Other Race	85,753	4.9
<u>HISPANIC OR LATINO</u>		
Total population	1,748,066	100.0

<u>Race</u>	<u>Number</u>	<u>Percent</u>
Mexican	29,917	1.7
Puerto Rican	75,840	4.3
Cuban	83,713	4.8
Other Hispanic or Latino [5]	248,777	14.2
Not Hispanic or Latino	1,309,819	74.9
<u>HISPANIC OR LATINO AND RACE</u>		
Total population	1,748,066	100.0
Hispanic or Latino	438,247	25.1
White alone	341,414	19.5
Black or African American alone	17,842	1.0
American Indian and Alaska Native alone	1,671	0.1
<u>Race</u>	<u>Number</u>	<u>Percent</u>
Native Hawaiian and Other Pacific Islander alone	149	0.0
Some Other Race alone	55,542	3.2
Two or More Races	20,526	1.2
Not Hispanic or Latino	1,309,819	74.9
White alone	760,817	43.5
Black or African American alone	449,677	25.7
American Indian and Alaska Native alone	3,394	0.2
Asian alone	55,692	3.2
Native Hawaiian and Other Pacific Islander alone	762	0.0
Some Other Race alone	9,152	0.5
Two or More Races	30,325	1.7

B) The frequency with which LEP persons come in contact with Broward Sheriff’s Office services.

The Broward Sheriff’s Office will use various methods to identify and determine the number of LEP persons with whom they have contact.

To determine the frequency with which LEP persons come in contact with BSO programs, all BSO employees who come in contact with a LEP person will capture every contact whether in person or via telephone on appropriate designated forms.

Current and past LEP person encounters will be analyzed to determine the language services requested and the agency’s ability to provide.

The data collected will be utilized to determine the effectiveness of BSO’s current services offered to LEP persons.

C) The nature and importance of the program, activity, or services provided by the Broward Sheriff's Office to the LEP population.

The BSO provides crisis intervention, short-term counseling and referrals, criminal justice information, court support and emergency assistance for limited shelter, food and basic physical needs to crime victims. It is also the responsibility of the agency to notify known, contactable victims of the pending release, including community work release of sentenced prisoners incarcerated in Broward County jails. For many people, being a victim of, or witness to a crime may be their first experience with the criminal and juvenile justice systems.

It is the policy and practice of the agency to ensure that no one shall be discriminated against nor denied meaningful access to, and participation in, the programs and services provided by the BSO. The agency will continue to provide appropriate services to the LEP persons to ensure that they have full and complete understanding of the services, rights and benefits that they are entitled to.

D) The resources available and cost to the recipient.

The BSO with the grant funds and other available resources shall notify LEP persons that language services are available to them at no cost and shall take reasonable steps to see that language services are provided according to the provisions of the Broward Sheriff's Office LEP Plan and Policies.

The BSO will continue to use grant funds and other available resources to provide appropriate language assistance to the LEP persons. Qualified Interpreters, bilingual staff, Language Line Services and referrals to community liaisons proficient in the language of LEP persons will be utilized to effectively serve the LEP community.

The BSO will continue to use grant funds and other available resources to print and distribute vital documents in different languages as need arises to ensure meaningful access for the LEP persons. The agency currently translates documents in seven different languages; Spanish, Creole, Portuguese, Arabic, Russian, Chinese and German. The BSO will consider additional languages upon request or as deemed necessary for effective outreach.

III. Language Assistance

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to Broward Sheriff's Office services. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language.

The following are the services the Agency provide to LEP persons:

A. Oral Language Assistance:

The Agency will provide oral language assistance, including Oral Interpretation Services by Qualified Interpreters, Bilingual staff, Telephone service lines interpreters via the Language Line Services and referrals to community liaisons proficient in the language of LEP persons. These services will be offered free of charge whether in person or via telephone. At the point of first contact with an LEP person, the BSO employee will determine whether the person has a limited English proficiency by determining his or her primary language and implement the appropriate language assistance service.

1. Face to Face:

Qualified Interpreter:

The agency when necessary will provide a qualified interpreter to assist with providing services to the LEP person. The agency will provide this service free of charge.

Bilingual Staff:

A list of Broward Sheriff's Office staff who fluently speak, read, write and/or understand languages other than English, and who are willing and able to act as interpreters has been identified. The BSO employees who may encounter LEP persons are aware that this list is available in Human Resources to assist them with providing appropriate services to LEP persons. Additionally, BSO is able to identify employees who are capable to assist with translations into multiple languages.

2. Telephone Encounters:

To ensure meaningful access and participation for LEP persons, the BSO employees will dial into the Language Line Services to set-up conference calls between the LEP person and trained interpreter. The BSO employee will identify themselves, request the appropriate language needed, brief and summarize to the interpreter what they wish to accomplish, give any special instructions, and begin the conference call. The BSO employee with assistance from the trained interpreter will assist the LEP person with his or her needs. This service is always provided free of charge.

B. Translations of Materials:

Language Assistance will be provided for LEP person through language translations and/or oral interpretations of some key materials, upon request or as deemed necessary for effective outreach. Currently, the BSO provide the following translations:

Victims and Witnesses Translation Cards:

When first encountering a LEP person in a face-to-face situation, the BSO employees have access to Victim and Witnesses Translation Cards to assist with identifying the primary language of the victim/witness. The Victim and Witnesses Translation Cards are provided in five different languages; Spanish, Arabic, Russian, Chinese, and German.

Victims and Witnesses Handbooks:

The Victims and Witnesses Handbooks are provided in three translated languages; Spanish, French Creole and Portuguese. When dealing with a LEP person the BSO employee will provide the Victims and Witnesses Handbooks to ensure the LEP person obtains full understanding of the services provided by the agency, and of their rights and benefits.

C. Marketing and Outreach:

Marketing and Outreach information disseminated via the external BSO website (www.sheriff.org) allows the public viewers via a drop down menu to translate and view the website's content in 91 different languages. This website and translation option provides the LEP person and/or groups with access to detailed information about the agency and Broward County.

IV. Notifying LEP Persons

It is important to notify LEP persons of services available free of charge in a language that would be understood. The agency will continue to provide booklets and materials in translated languages to alleviate any language barriers that may interfere with LEP person receiving effective service from the agency. The agency will also continue to provide assistance to LEP person by utilizing Bilingual Staff, Qualified Interpreters, and Language Lines Services.

V. LEP Training for Agency Employees

In order to establish meaningful access to information and services for all affected persons, BSO employees who may encounter LEP persons will receive appropriate training on addressing the needs of LEP persons. The training will include:

- Information on the Title VI Policy and LEP responsibilities.
- Executive Order 13166
- LEP Plan Compliance
- Types of Language Services
- Vital Translated Documents
- How to handle a potential Title VI/LEP complaint.

VI. Plan Monitoring

The Agency shall monitor implementation of the LEP Plan and Policies on an ongoing basis, making revisions to policies and procedures as needed and required. The Agency shall also review the overall effectiveness of its LEP Plan and Policy. This review shall consider information from the following sources and criteria as well as other appropriate factors:

- Changes in demographics including new language groups and changes in the proportion of existing language groups.
- Frequency of encounters with LEP persons.
- Determine whether language assistance programs have been effective and sufficient to meet the needs of LEP persons.
- Availability of new resources including technology.
- Determine whether the Broward Sheriff's Office fully complies with the goals of this LEP Plan.
- Determine whether complaints have been received concerning the agency meeting the needs of LEP persons.

VII. Plan Dissemination

Internal Dissemination:

- A copy of the LEP Plan will be posted on the agency's internal website for all employees to view.
- Employees may obtain a copy of the plan upon request.

External Dissemination:

- A copy of the LEP Plan will be posted on the agency's external website for the public to view.
- Public may obtain a copy of the plan upon request.