

**The Commonwealth of Massachusetts**  
**Sex Offender Registry Board**  
**Language Access Plan**

**I. Introduction**

The Sex Offender Registry Board (SORB) is committed to ensuring equal access to its programs and services by all residents, regardless of primary language spoken or English proficiency. Persons who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English can be considered Limited English Proficient (LEP) persons with limited English proficiency. The SORB has prepared this Language Access Plan (“LAP” or “Plan”), which defines the actions to be taken by the SORB to ensure meaningful access to agency services, programs and activities on the part of persons who have limited English proficiency. The SORB will periodically review and update this LAP in order to ensure continued responsiveness to community needs and compliance with the Executive Office for Administration and Finance (“ANF”) Administrative Bulletin #16.

**II. Purpose**

The purpose of this plan is to ensure the SORB provides meaningful access to services, programs and activities to victims, the public and sex offenders although they may be limited in their English language proficiency.

The SORB is committed to this Language Access Plan as the appropriate response to meeting the needs of victims, the public and sex offenders. The Plan is consistent with the requirements of Administrative Bulletin #16 as promulgated by the Executive Office of Administration and Finance.

Consistent with the guidance of ANF Administrative Bulletin #16, a Limited English Proficient (“LEP”) person is someone who is not able to speak, read, write or understand the English language at a level that allows him/her to interact effectively with SORB staff. A client maintains the right to self-identify as a LEP person.

**III. Agency Description**

The Sex Offender Registry Board (SORB) was established pursuant to Chapter 74 of the Acts of 1999, codified at M.G.L. c. 6, sections 178C-178Q. The SORB is an administrative agency within the Executive Office of Public Safety and Security (EOPSS). The SORB is charged with the responsibility of identifying registerable sex offenders in accordance with the laws of the Commonwealth, classifying registerable sex offenders, as well as ensuring compliance with registration and dissemination mandates in accordance with the laws of the Commonwealth. It is also responsible for maintaining the Commonwealth's database of sex offender information. These functions serve to provide the public with information to raise the level of safety in the community.

The SORB works closely with local law enforcement agencies and the State Police to ensure the proper registration of sex offenders, who live, work and/or attend an institution of higher education in Massachusetts. In addition to registration responsibilities, the SORB is the sole agency responsible for the classification of each registered sex offender.

The SORB classification of a sex offender determines if and how information pertaining to a sex offender may be released to the public. Currently, there are three classification levels for sex offenders under the SORB process. Level 1 is the least onerous classification that the SORB can assign a convicted or adjudicated sex offender. The SORB assigns Level 1 when it determines that an offender presents a low risk to re-offend and a low risk of dangerousness to the public. Level 2 is the classification given by SORB to convicted or adjudicated sex offenders who the SORB has determined present a moderate risk to re-offend and have a moderate risk of dangerousness. Level 3 is the classification given by the SORB to convicted or adjudicated sex offenders who the SORB has determined present a high risk to re-offend and a high risk of dangerousness. Sex offenders classified as Level 2 or Level 3 are required to appear before the police department where the offender resides annually or appear before the police department every 30-days if the offender is homeless. In addition, Level 3 offenders are posted on the Internet.

#### **IV. Language Access Plan:**

(1) Agency Language Access Coordinator: Jeanne L. Holmes, P.O. Box 4547, Salem, MA 01970, 978-740-6500, [Jeanne.Holmes@state.ma.us](mailto:Jeanne.Holmes@state.ma.us)

(2) Agency Language Access Needs Assessment:

Contacts between SORB and persons with limited English proficiency are through phone calls, hearings, and written communications. Examples include interactions by victims and sex offenders with staff during the classification and registration process. Oral interpretation services may be needed for these contacts, and must be provided for these interactions depending on the nature and importance of the information being provided, as well as the availability of resources. Other contacts involve the exchange and review of printed materials, some of which must be translated. A listing of the types of documents that must be translated include, but are not limited to, the following:

- Registration forms
- Classification forms
- Hearings forms
- Police reports
- Victim impact statements

The majority of contacts with persons with limited English proficiency concerning the SORB occur directly through the classification hearings process.

- a. Language Makeup of Client Population  
The following languages have been identified as relevant to the SORB: Spanish, Portuguese, Italian, Greek, French, Russian, Cape Verdean, Haitian Creole, and Vietnamese.
- b. Points of Contact between Agency and Client Population  
Sex Offender Registry Board, P.O. Box 4547, Salem, MA  
01970, [Mass.Gov/SORB](http://Mass.Gov/SORB), 978-740-6400.

### **Language Resources Assessment:**

The present staff at the SORB are linguistically, culturally, and technically able to deliver services in Spanish and/or to serve as interpreters.

The SORB regularly hires interpreters through a statewide vendor to assist the agency in meeting language access needs.

Language translation of documents can be done through the use of free translation programs on the Internet.

### **Language Service Protocols:**

The SORB provides notice in the languages listed above that the forms should be translated. Due to the significant costs involved, the translation of all necessary forms would require a multi-year process. Furthermore, due to the limitations in identifying the appropriate language for translation, the SORB will make efforts in future years in further identifying the appropriate languages for translation of the documents. As follow up to the latter identification, the SORB will make efforts to translate information on its website.

The SORB will utilize bilingual staff resources as well as services which demonstrate a high degree of training and professionalism and that have been approved as vendors by the Commonwealth, in order to accommodate necessary and direct communications between the SORB staff and persons with limited English proficiency. The SORB will also work to identify community groups, non-profits, and other organizations that may serve as a cost-effective resource when necessary and appropriate for the agency's communication with persons with limited English proficiency.

### **Vital Document Translation:**

The SORB has identified vital documents used by the SORB that should be translated. The SORB regards vital documents as "any document that is critical for ensuring meaningful access to victims and sex offenders to the registration, classification and dissemination process.

The SORB will periodically review and update this list to reflect the documents that are vital to victims, the public and sex offenders.

The SORB will make efforts to identify the appropriate languages for translation of the agency website content.

**Stakeholder Consultations:**

The SORB will consult with law enforcement and victim advocate groups as the implementation of the Language Access Plan moves forward.

**Staff Training:**

The SORB will conduct training on the LAP with supervisors and managers. This training will familiarize the staff on their responsibilities in regards to the LAP. The LAP will be disseminated to all staff through a posting on the SORB Intranet. This will provide all staff, who are likely to have contact with LEP populations, with information on the implementation of the LAP. The SORB will engage in periodic reviews to ensure that the LAP is being appropriately implemented.

**Notice to Public.**

The SORB will continue to review the resources available to provide notice to victims, the public and sex offenders about language assistance and how that language assistance can be accessed.

**Agency Monitoring:**

Each year the SORB will conduct a review of the LAP as to compliance and to make any necessary changes/updates. The monitoring will include analysis of any significant changes in the language needs of those served by the SORB, determination of any additional documents that require translation, the number of LEP persons that come in contact with the agency, the nature of the contact, the resources available and the costs incurred in providing language access.

**Complaints:**

In the event that a person wishes to file a complaint regarding an alleged violation of these parameters of this LAP, he/she should file a complaint with the Agency Language Access Coordinator. A complaint may also be filed with the Office of Access and Opportunity (OAO), which will refer the matter to the Agency Language Access Coordinator for response and/or redress. In the event the complaint cannot be resolved at the agency level, the Office of Access and Opportunity will seek to resolve the complaint. OAO may be contacted at State House, Room 373, Boston, MA 02133, (617) 727-2040.

When filing a complaint, please refer to the Language Access Complaint Procedure attached to this plan.

\_\_\_\_\_  
Saundra Edwards: Agency Head

\_\_\_\_\_  
Date

\_\_\_\_\_  
Mary Elizabeth Heffernan  
Secretary

\_\_\_\_\_  
Date

## **ATTACHMENT**

### **Language Access Complaint Procedure**

You may file a complaint with the Agency Language Access Coordinator or the Office of Access and Opportunity if you believe you have been denied the benefits of this Plan. You must file your complaint within 6 months of the alleged denial. You must file a written complaint. To file a complaint with the Language Access Coordinator, submit the written complaint to:

Jeanne L. Holmes  
Language Access Coordinator  
Sex Offender Registry Board  
P.O. Box 4547  
Salem, MA 01970  
[Jeanne.Holmes@state.ma.us](mailto:Jeanne.Holmes@state.ma.us)

To file a complaint with the Office of Access and Opportunity, please submit the written complaint to the attention of:

Office of Access and Opportunity  
Executive Office of Administration and Finance  
State House, Room 373  
Boston, MA 02133  
[Ronald.Marlow@state.ma.us](mailto:Ronald.Marlow@state.ma.us)