

Annual Report on Implementation of Language Access

New York City Department of Transportation

March 30, 2020



This annual report provides an update on the agency's implementation of its Language Access Implementation Plan, as required by Local Law 30 (2017). The report covers activity during Calendar Year 2019.

This report also addresses updates for agencies covered by Local Law 73 (2003).

Section 1: Agency Information

Agency name	New York City Department of Transportation
Name of the agency's Language Access Coordinator (LAC) and all office titles held by this individual.	Deborah Siegel Baker, Language Access Coordinator
Link to the agency's Language Access Implementation Plan (LAIP) posted on the agency's website.	https://www1.nyc.gov/html/dot/html/about/dot_lap.shtml
Year the LAIP was last updated	April 30, 2018

Section 2: Agency language access policy

Describe your agency's language access policy and how it is communicated to staff.

In September of 2019, Roseann Caruana was appointed the Assistant Commissioner of the Customer Service, Language Access and Correspondence Unit (CSLACU). Several of the related functions in the Language Access Unit and the Commissioner's Correspondence and Customer Service Unit were centralized to streamline customer service and improve productivity.

DOT's CSLACU policy is to ensure efficient and equal access to Agency services, communications, programs and events for Limited English Proficient (LEP) customers by providing a full range of free language services. Meeting the language needs of all New Yorkers enables them to better access City services with the ultimate goal of increasing safety and improving their quality of life. By prioritizing the translation of License, Permit and Registration applications (LPRs), in accordance with Local Law 30 (LL30) we facilitate New Yorkers' mobility and increase economic opportunity, enabling our customers to better conduct business in and with the City. Translation of educational documents and the provision of in-person interpreters at DOT events or community meetings, enables residents to actively participate in safety education, project planning and other vital City transportation initiatives, campaigns and programs.

CSLACU is responsible for ensuring the accuracy of all translated materials and streamlining translation and interpretation requests with reduced wait times for translations, including written, in-person or telephonic interpretations. DOT's Language Access policy is driven in support of Mayor Bill de Blasio's initiatives to promote equity and diversity, as well as economic and civic-engagement. This policy is communicated to DOT staff through the inclusion of a Language Access portal on the Agency's SharePoint page. This portal includes direct access to LAD for submitting translation and interpretation requests, information about LL 30 and an online training manual detailing processes for different Language Access requests. In 2020, CSLACU has renewed its efforts to recruit Language Bank Volunteers (LBVs) from DOT staff and plans to distribute an internal Language Access newsletter to keep staff apprised of policy, achievements and needs related to Language Access.

Section 3: Language Access Accomplishments

Identify your agency's language access accomplishments during calendar year 2019 (CY19).

During CY 2019, Language Access fulfilled 251 requests for translated documents, provided in-person interpreters for 55 events and facilitated 1,183 over-the-phone interpretations. In addition to essential documents, such as the 2020 Alternate Side Parking (ASP) Calendar, prepared in 2019, and the Staten Island Ferry Schedule, Language Access facilitated translation of Safety Education materials, project-specific informational brochures, signs and surveys. The ASP Parking Calendar (ASP), Staten Island Ferry Schedule and all City-wide project-specific materials were translated into Haitian Creole, Italian, Korean, Russian, Spanish, Traditional Chinese, Arabic, Bengali, Polish, French, Urdu, Yiddish, Greek (in the ten designated languages, plus Italian, Yiddish, and Greek); whereas local event or project-specific materials were translated into languages relevant to the communities where the project or event took place. In addition to the ten designated City-wide languages, Language Access provided translations in Hindi, Punjabi, Yiddish, Italian, Greek, Albanian, Portuguese and Tagalog. CSLACU continues to build an in-house Glossary of Commonly-Used Transportation Terminology which is currently available in Spanish, Traditional Chinese, and Russian.

The 1,183 Telephonic interpretations were provided in 22 languages: Spanish, Russian, Mandarin, Cantonese, Hindi, Bengali, Arabic, Italian, Somali, Polish, Swahili, Korean, French, Greek, Vietnamese, Hebrew, Haitian Creole, Farsi, Albanian, Hungarian, Dari and Nepali. In-person interpreters provided translations in seven languages: Chinese, Spanish, Russian, French, Haitian Creole, Ukrainian and Korean. Language Access's in-house graphic designer created publications translated into location-specific languages including postcards, flyers, posters, and brochures in support of specific DOT initiatives and community outreach events. Our graphic designer also developed digital signage for our eight Public Service Centers, including Customer Holiday Notification digital signs and improved "Free Interpretation" digital signs in English, Spanish, Chinese and Russian.

Although completed in January 2020, CSLACU undertook the review of all essential documents and License, Permit and Registration (LPR) applications in 2019. Following review for plain language, 40 LPR applications and related documents (totaling 51 documents) were sent to our translation contractor, LanguageLine Solutions, for translation into the ten designated citywide languages. Obsolete documents were removed from our Essential Documents list, reducing the list from 32 to 19. Several of the remaining documents are now being revised for plain language, with translation into the city-wide languages to follow.

We conducted approximately ten visits to our eight Public Service Centers (PSCs) to check on Language Access posters, replenish materials such as translated documents, and to provide refresher training to all staff on procedures for providing language access services to in-person customers. Language Access staff participated in coordinating DOT's 2019 Summer Streets events with six interpretation sites placed between Foley Square and 51st Street, which provided interpretations in: Spanish, French, Cantonese, Mandarin and ASL. Language Access staffg also participated in all seasonal bicycle helmet fittings by providing interpreters and staff who assisted with fittings, as well as gave safety instructions in Spanish, Mandarin and Cantonese at all fittings. Russian instruction was provided at select sites.

In the last quarter of 2019, CSLACU's reorganization eliminated backlogs, focused on translating LPRs into the ten designated languages as mandated by LL 130, instituted improvements to the Language Access Database (LAD) and set up processes to increase the speed and efficiency of responses to translation requests.

Section 4: Language Access Goals

Identify the agency's language access goals from its most recent Language Access Annual Report. Describe the progress you have made in reaching those goals.

Reorganization and Consolidation of Language Access

Since the CSLACU reorganization, several program improvements have been initiated with several others in the planning phase, as follows:

Essential Documents:

• **Upgrading Essential Documents and eliminating obsolete documents**

CSLACU has reviewed the Agency's key documents:

- Contacted all operational units to ascertain which documents require updating and which documents should be prioritized for plain language creation
- Obsolete documents were removed, starting at 32 and reducing to 19 essential documents being translated into the top ten languages.
- Creating tracking/maintenance database
- All new documents will be converted into plain language, as appropriate.

Plain Language Initiatives:

- CSLACU scrutinized work product of plain language consultant and consulted with operational units for whom documents were revised to plain language versions
- As a result, CSLACU created an in-house plain language version of the PPPD Brochure
 - o In 2019, the CSLACU team reviewed and revised FAQs to conform with new FAQ PPPD correspondence completed in 2018 and approved by PPPD Unit and Legal
 - o Document has been circulated for review/approval
 - o Redesigned the graphics and are awaiting approved text in order to complete brochure
 - o Latest version will be printed, translated into the top ten languages and included in the Essential Document binder
- CSLACU is creating plain language versions of additional Essential Documents
- CSLACU is also researching various Plain Language websites and software developers to determine their effectiveness in expanding our toolbox.

Language Access Database (LAD):

- Enhanced LAD user experience with additional improvements to the technology, accessibility, layout, and submittal process. Future plans are underway to upgrade the use and technology of LAD.

Glossary of Commonly Used Transportation-related Terminology:

- CSLACU continues to build its glossary which is currently available in Spanish, Traditional Chinese, and Russian
- Secondary review was conducted for each of the translated terms

Literature Requests:

- CSLACU eliminated the backlog of 3,500 Literature Requests and improved the turnaround time from 30 days to 2 days.
- Literature requests are now being input into the Agency Response Tracking System (ARTS) to enable tracking and follow-up on returned envelopes.

Expansion of the Use of Verizon Message Boards:

- CSLACU is working on expanding the use of the Verizon Message Boards with plans to install them at DOT Public Service Centers. This will create geographically and demographically targeted communications and increase the Agency's reach.

1 - Subcategory: Translation

(§23-1102 a.(1))

Identify the progress that the agency has made in translating its most commonly distributed documents into the 10 designated languages.

In 2019, two of our Essential Documents were designated for translation. The Staten Island Ferry Schedule was translated into a total of thirteen languages: Haitian Creole, Korean, Russian, Spanish, Traditional Chinese, Arabic, Bengali, Polish, French, Urdu, Italian, Greek, and Yiddish (the top ten designated, plus Italian, Greek, and Yiddish). The Alternate Side Parking Calendar, was sent to be translated into the same thirteen languages during CY 2019.

In addition, Language Access translated a total of 251 documents to be distributed to LEP customers for the following units: Executive/ Communications and Press, Safety Education, Franchises & Consents, and Legal; Traffic Planning & Management/ Bicycles & Pedestrian Programs, Regional & Strategic Planning, and Research Implementation & Safety; Traffic Operations/ Authorized Parking & Permits; Offices of the Manhattan, Queens and Brooklyn Borough Commissioners; and two specific Vision Zero-related requests. Seventeen languages are represented in the overall document translations: Spanish, Traditional Chinese, Simplified Chinese, Korean, Russian, Arabic, Haitian Creole, French, Polish, Bengali, Urdu, Yiddish, Greek, Punjabi, Hindi, English, and Vietnamese. Based upon the most recent American Community Survey data from the U.S. Census Bureau, Language Access also determined which languages, in addition to the top ten mandated by Local Law 30, are utilized in translating DOT content for forms, flyers, palm cards, signage, meeting notices, etc.

Translation Requests by Language		
#	Language	# of Translations
1	Spanish	86
2	Traditional Chinese	43
3	Simplified Chinese	22
4	Korean	16
5	Russian	16
6	Arabic	13
7	Haitian Creole	11
8	French	10
9	Polish	7
10	Bengali	6
11	Urdu	6
12	Yiddish	5
13	Greek	3
14	Italian	3
15	Punjabi	1
16	Hindi	1
	English (From Spanish)	1
17	English (From Vietnamese)	1
	Total	251

2 - Subcategory: Telephonic Interpretation

(§23-1102 a.(2) and §23-1102 c.)

Identify the progress the agency has made providing telephonic interpretation during CY19.

In 2019, Language Access processed a total of **1,183** over-the-phone interpretations on behalf of LEP customers for the following units: Traffic Operations, Bureau of Permits, Sidewalk Inspection, Executive, Bridges, External Affairs, Finance, Contracting & Program Management, HIQA, and Roadway Repair.

A total of 22 languages were accessed: Spanish, Russian, Mandarin, Cantonese, Hindi, Bengali, Arabic, Italian, Somali, Polish, Swahili, Korean, French, Greek, Vietnamese, Hebrew, Haitian Creole, Farsi, Albanian, Hungarian, Dari, and Nepali.

Over-the-Phone Interpretations by Language			
#	Language	Minutes	Calls
1	Spanish	4813	642
2	Russian	2787	358
3	Mandarin	836	75
4	Cantonese	322	36
5	Hindi	228	19
6	Bengali	78	5
7	Arabic	70	9
8	Italian	60	12
9	Somali	49	2
10	Polish	42	1
11	Swahili	35	2
12	Korean	32	5
13	French	24	1
14	Greek	22	3
15	Vietnamese	21	3
16	Hebrew	16	2
17	Haitian Creole	12	1
18	Farsi	9	2
19	Albanian	7	2
20	Hungarian	7	1
21	Dari	4	1
22	Nepali	1	1
Total		9,475	1,183

3 - Subcategory: In-Person Interpretation

(§23-1102 a.(2))

Identify the progress the agency has made providing in-person interpretation during CY19.

Over the course of 2019, Language Access received **55** different interpretation service requests from DOT Units for interpreters at various DOT events. Languages included: Chinese [Mandarin and Cantonese], Spanish, Russian, French, Haitian Creole, Ukrainian, and Korean. A total of **171** interpreters were assigned to DOT-related events such as: public surveys, Truck's Eye View demonstrations, merchant surveys, Annual Summer Streets, Bike Helmet Fittings, and a multilingual hotline recording for DOT. For each event, DOT Units requested two to three languages for their events. For events lasting longer than two hours, more than one interpreter was assigned per language. For example, Language Access assigned 9 interpreters to the Bike Helmet Fitting training: 3 Spanish, 3 Chinese, and 3 Russian.

- Language Access received requests from the following DOT Divisions/Units: Urban Design+Art+Wayfinding, Strategic Planning, Street Ambassadors, Public Engagement Unit, Public Space, Safety Education, Advocate's Office, Legal Affairs and Freight Mobility. The requesting boroughs and number of according requests were: Manhattan (27), Queens (9), Brooklyn (9), Bronx (8), Staten Island (1), and Governors Island (1).
- In 2019, DOT hired additional full-time staff. Language Access's two Community Associates have increased our ability to provide timely language access to the Spanish and Chinese speaking public. They provide crucial support and coordination of contracted professional interpreters and assist DOT Street Ambassadors and other agency Community Outreach Specialists and Project Managers in the planning, conducting and monitoring of agency events for LEP customers.

In-Person Requests by Language			
#	Languages requested	Interpreters by Language	Assignments by Language
1	Chinese	81	31
2	Spanish	75	43
3	Russian	6	4
4	French	5	3
5	Haitian Creole	2	1
6	Ukrainian	1	1
7	Korean	1	1
Total		171	84

In-Person Requests by Borough		
#	Borough	Events by Borough
1	Manhattan	28
2	Queens	9
3	Brooklyn	9
4	Bronx	8
5	Staten Island	1
Total		55

American Sign Language

CSLACU will be centralizing the Agency’s requests for Sign Language (ASL) Interpreters which will result in all interpreter requests being submitted through DOT’S Language Access Database (LAD). Previously, Franchises/ Concessions & Consents (FCC) was sending sign language requests directly to our vendor, Accurate Communications, totally 27 separate requests, resulting in 47 ASL interpreters being assigned to DOT meetings. The new process will provide a streamlined flow of requests.

Language Access provided 32 ASL interpreters utilizing the Accurate Communication contract. These interpreters attended four events both onsite and offsite and two to three ASL interpreters were assigned to each of the four scheduled events, including: a Black History Month Panel, and three Annual Summer Streets festivals (taking place at five different sites over the course of three weekends). In calendar year 2019, a combined total of 31 requests for ASL sign interpreters were fulfilled, resulting in 79 ASL interpreters present at DOT meetings and events.

American Sign Language Interpretation Requests		
UNIT	# of Requests	# of ASL Interpreters
Franchises/ Concessions & Consents	27	47
Language Access	4	32
TOTAL	31	79

4 - Subcategory: Posting of multilingual signage about the availability of free interpretation services

(§23-1102 a.(3))

Identify the progress the agency has made posting multilingual signage about free language services.

In 2019, there were 11 Public Service Centers (PSCs); however, due to construction at the Queens PSCs, the year ended with eight PSCs. The PSCs are routinely serviced to maintain signage offering free language services. The Mayor's Office of Immigrant Affairs' poster alerting LEP customers of their right to access interpreters in their native language was posted in all of our PSCs, together with a poster designed by DOT with a similar message. The PSC managers are also trained to offer the telephonic translation services to any customer requiring translation assistance. Progress was made to coordinate media production and community LEP outreach efforts, as evidenced by the publications distributed and listed on the following pages:

1. Publications

- Postcards (4 Postcards; various language translations, see context below):
 - "Get There Without a Ticket" postcard - word flow corrections incorporating (Spanish & Chinese) translations. Prepared final document for print.
 - "Free Interpretation Available, We're Here to Help" postcard - formatted three translations (Spanish, Chinese & Russian) Prepared final document for print.
 - Vision Zero "Jamaica Avenue" postcards transcribed Punjabi into layout, editing to accommodate word flow, provided native file package created final for print.
 - "Welcome/Free Interpretation Cards" to be distributed to 11 Public Service Centers. Designed 11 PSC Cards containing 10 languages (English, Spanish, Russian, Chinese, Korean, Haitian Creole, Italian, Bengali, Arabic and Polish) for LanguageLine translation. **Total: 110 cards (originals) - usually 500 copies are printed.**
- **Flyers (3 Flyers; various language translations, see context below):**
 - "Car- Free Earth Day"
Transcribed Spanish translation into flyer's layout; altered design to accommodate translated text overflow. Prepared final document for print.
 - "Parking Regulations - Info on Website/Sign Legend" flyer designed for Permits & Customer Service's Public Service Center at 30-30 Thomson Ave. (English)
Prepared final document for print.
 - "WalkBus Pilot Program for Parents" flyer for Safety Education - transcribed into four languages: (English, Spanish, Arabic & Traditional Chinese); revised design/edited images to incorporate text overflow
- **Brochure (1 brochure; awaiting approval will be printed in 11 languages):**
Designed "Parking for People with Disabilities (PPPD)" brochure (new look) for revised textural content. (Project in progress)

2. Posters/Postcards - Community Outreach Events

(5 Posters; 1 Postcard; 1 Identity Card: various language translations):

- "Truck's Eye View": Designed poster "Free Interpretation Available, We're here to help" for community event. Formatted/transcribed three translations: (English, Spanish, Chinese & Russian)
- "NYC Cycling": Bike Outreach Poster - reformatted layout to improve text legibility in (Spanish, Chinese and English)
- "Under the L" Sunset Park event:
 - Designed postcards "Free Interpretation" (English, Spanish & Chinese)
 - Designed one poster "Free Interpretation" (English, Spanish & Chinese)
 - Designed NYC DOT identity cards (DOT logo & LA logo) to fit inside "interpreter's vest sleeves"
- "Summer Streets":

Designed “Free Interpretation” posters (24x36)
(English, Spanish & Chinese on each board)

- “Bike Helmet Fitting”:
Designed “Free Interpretation” posters (24x36)
(English, Spanish & Chinese on each board)

3. Digital Signage – Public Service Center (PSC) at 55 Water St

(4 digital signs; various language translations, see context below)

- Language Access updated, designed, and reformatted digital informational and campaign digital signage for the PSC at 55 Water Street.
- Language Access designed Customer Holiday Notification digital signs: New Year’s Day, Martin Luther King Junior Day, Presidents’ Day, Independence Day, Labor Day, Columbus Day, Election Day, Veterans Day, Thanksgiving Day, and Christmas Day
- For easy readability Language Access designed business hours digital signs for all PSCs and Borough Commissioner Offices based upon plain language/accessibility criteria - (digital signs will be available in these offices in the near future, awaiting Verizon Digital Signage technology approval)
- Language Access designed “Free Interpretation” digital signs: English, Spanish, Chinese and Russian.
- Additional digital signs were added for Business Hours, Register to Vote, Work Zone Awareness and “Summer Streets” (featured event) for the display loop
- Additional “Left Turns are Dangerous” digital signs were added for the display loop
- Language Access reformatted Vision Zero “Left Turns are Dangerous” campaign for digital signage

5 - Subcategory: Emergency Preparedness and Language Access
(§23-1102 b.(5))

Identify the agency’s progress to ensure that language access services are provided during an emergency response.

CSLACU is finalizing an emergency translation plan to provide agency-wide translations and/or interpretation services to LEP customers in the event of an emergency. The plan will involve deploying LBVs and interpreters to the emergency site, as necessary, to provide immediate translation services. It will also involve coordinating rush translations of information documents needed for distribution during an emergency.

In an effort to better determine the language proficiency of DOT’s field workers and prepare a database of internal language needs, CSLACU produced a Work Zone Safety survey that was distributed on November 28, 2019 to field workers in the Sidewalk Inspection Management (SIM), Roadway Repair and Maintenance (RRM), and the Bridges Divisions. All of the surveys were returned by December 20, 2019. The purpose of this survey was to determine the need for Work Zone Safety training in additional languages. The survey asked three simple questions and provided 11 language choices and “Other”, as seen below:

Thank you for taking the time to help us improve Work Zone Safety Training.
Please take a moment to answer these questions.



What language do you speak or understand most often?

English Spanish Chinese (Mandarin) Russian Korean Urdu
 Bengali Arabic Haitian Creole French Polish Other_____

What language do you prefer to receive Work Zone Safety Training?

English Spanish Chinese (Mandarin) Russian Korean Urdu
 Bengali Arabic Haitian Creole French Polish Other_____

In what language do you prefer to receive Work Zone Safety Training materials?

English Spanish Chinese (Mandarin) Russian Korean Urdu
 Bengali Arabic Haitian Creole French Polish Other_____

6 - Subcategory: Multilingual Agency Communications

(§23-1102 b.(6))

Identify your agency's progress toward making other types of agency communications accessible to individuals and/or communities with LEP customers. Other types may include emergency notifications, public hearings and events, press releases, website content, social media, and other communications to the public. 2019:

Language Access staff actively participated at Public Hearings and Community Board Meetings. Various Community Boards did publicize DOT outreach events to LEP communities through placement of advertisements in local newspapers published in languages other than English. Prior to comprehensively translating the LPRs into the ten mandated languages, which will be in full compliance by June 30, 2020. In 2019, Language Access received the most interpretation requests (56 in 2019 vs. 30 in 2018) and assigned the most interpreters in the unit's history (189 in 2019 vs. 57 in 2018). This is due to the increased involvement of Language Access in facilitating events planned by DOT operational units, which has created a strong rapport between Language Access, DOT's internal groups, our DCAS-contracted interpreters, and the Limited English Proficient (LEP) public.

For the Black History Month: "New Faces in New Mobility" panel held for DOT employees, Language Access provided two American Sign Language (ASL) interpreters to interpret the lecture for requesting attendees. In the first half of the calendar year, Language Access aided DOT's Urban Design+Art+Wayfinding Division in a public survey to assess the accessibility of the WalkNYC signage posted citywide. Language Access translated the survey, and provided interpreters to conduct the multilingual surveys in the following languages on five different deployments: Spanish (two at each date), Chinese (one Mandarin and Cantonese at each date), Russian (one at Brighton Beach date), Ukrainian (one at Brighton Beach date), Korean (one at the Queensboro Plaza date), and Haitian Creole (two at the Grand Concourse date). Surveys were conducted on the sidewalks of hubs in Queen's Queensboro Plaza and Flushing, Bronx's Grand Concourse, Brooklyn's Brighton Beach, and Manhattan's Chinatown.

In conjunction with the Office of Freight Mobility's "Truck's Eye View" initiative, Language Access and its in-house Graphic Artist designed and printed promotional posters and palm cards to publicize five events for safety awareness. Two Spanish, and two Chinese (one Mandarin and one Cantonese) Interpreters were on hand at each of the events to explain truck safety tips and to give New Yorkers a glimpse behind the driver's seat of a Department of Sanitation truck to see how obtrusive blind spots are when seated in the cab. After this, Language Access assisted by recording their trucking hotline in English, Spanish, and Mandarin for New York City truckers.

In July, Language Access was asked by DOT's Urban Design unit to provide interpretation at Manhattan's Community Board 3 meeting regarding their upcoming "Gateways to Chinatown" installation to be constructed in the heart of Chinatown. Language Access provided one Spanish, one Mandarin, and one Cantonese interpreter to answer questions from the public about the design and origin of the art project. Before DOT's annual Summer Streets festival (in which Park Avenue is closed to car traffic and turned into a pedestrian and biking route), DOT's Urban Design+Art+Wayfinding Division, Regional & Strategic Planning sub-division, and the Office of Freight Mobility reached out to Language Access to provide interpretation at six separate Park Avenue rest stops on the first three Saturdays in August. For all three dates, Language Access provided ASL, Spanish, Chinese (Mandarin and Cantonese), and French interpreters to staff informational booths at the event. The in-house Graphic Artist from Language Access created five multilingual posters with ASL, Spanish, and Chinese promotion to display at each of the interpretational rest stops.

In the fall, for the first time in the Unit's history, Language Access participated in DOT's Free Bike Helmet Fitting event, which occurs August through October annually. Members of Language Access, as well as Spanish (two at each date), Chinese (one Mandarin and Cantonese at each date), Russian (one date), and

Arabic (one date) interpreters were trained to safely fit and distribute free bike helmets for the public. The unit attended 11 bike helmet fittings over the two months to fit and give away over 20,000 bike helmets to New Yorkers, regardless of which language they speak.

The final events of the year that Language Access took part in were merchant surveys in Sunset Park conducted by DOT's Street Ambassadors. The aim of the study was to ascertain the need for alleviated delivery traffic outside the businesses 8th Avenue commerce hub. As the majority of business owners spoke at least one of many dialects of Chinese, Language Access attended the three deployments in the fourth quarter, and assisted by supplying two Mandarin, one Cantonese, one Cantonese and Fujianese, and one Mandarin-speaking member of Language Access. Language Access will once again work with the Street Ambassadors on their deployments in February, 2020.

7 – Subcategory: Plain Language

(§23-1102 b.(7))

Identify the agency's progress in ensuring that communications with the public are in plain language.

- **Plain Language Initiative**
 - The newly revitalized CSLACU evaluated the existing plain language vendor contract
 - Scrutinized work product produced in 2019 and consulted with operational units for whom documents were revised to plain language versions
 - CSLACU is creating an in-house plain language version of the PPPD Brochure
 - CCU team reviewed FAQs and revised to conform with new FAQ PPPD correspondence completed in 2018 that was approved by PPPD Unit and Legal
 - Revised document has been circulated for review/approval
 - Redesigned graphic and is awaiting approved text in order to complete brochure
 - Latest version will be printed, translated into the top ten languages and included in Essential Document binder
 - CSLACU is also researching various Plain Language websites and software developers to determine their effectiveness in expanding our toolbox.

8 – Subcategory: Licenses, Permits, and Registrations

(§23-1102 b.(12))

*Note: The deadline for this section of Local Law 30 is June 30, 2020. Provide updates as applicable.

If your agency issues licenses, permits, and registrations, identify its progress toward providing language access when issuing licenses, permits, and registrations.

DOT issues approximately forty (40) different licenses, permits and registrations (LPRs). CSLACU spent the final quarter of 2019 identifying and verifying that we had the most up-to-date versions of the Agency’s LPRs for inclusion in the MOIA Airtable, before translating them into the top ten languages mandated by Local Law 30. Below is a summary of actions towards meeting our LPR mandate:

Local Law 30 License, Permit and Registration (LPR):

- **LPR Translations**
 - Identified all current LPR applications
 - LPRs will be sent to LanguageLine Solutions for translation into the top ten languages
 - Secondary reviews of translations will be conducted utilizing two consultants
- **Training Operational Units and Public Service Center (PSC) staff for the roll-out of the new web LPR landing page.**
 - Training session has been scheduled for May 8, 2020 with PSC staff, LBVs, and Operational Managers
- **Redesigning DOT’s homepage to create a new landing portal for LPR documents**
 - Directing customers to separate LPR and “Essential/Important Document” pages
 - Customer will be able to choose the language they require
 - Once a category is chosen, customers will be able to choose the LPR category of document

To properly assess LPR requests for LEP customers and to satisfy all compliance standards set forth by Local Law 30 and Executive Order 120, DOT is guided by the **United States Department of Justice’s (DOJ) 4-Factor Analysis.**

1) Factor 1: The Number or Proportion of LEP Persons Eligible to be Served or Likely to be Encountered by the Program

CSLACU has estimated the **number of LEP persons eligible to be served or likely to be encountered** based on published data from the 2018 United States Census Bureau/American Community Survey. The most common languages spoken and read by approximately 1.8 million LEP persons (those identified as “Speaking English less than very well”) in New York City are:

#	Language	Percent
1	Spanish	48
2	Chinese	18
3	Russian	6
4	Bengali	3
5	Haitian Creole	2
6	Korean	2
7	Arabic	2
8	Yiddish	2
9	French	1
10	Polish	1
11	Urdu	1
12	Italian	1

By June 30, 2020, CSLACU will have completed translating its most commonly distributed LPR applications and supporting documents (40 total) into the ten designated Citywide languages spoken and read in New York City, including Spanish, Chinese, Russian, Bengali, Arabic, Korean, Haitian Creole, Polish, Urdu, and French.

2) Factor 2: Frequency with which LEP Persons Come in Contact with the Program

In addition to the population data provided by the American Community Survey and in accordance with Executive Order 120 and Local Law 30, DOT measures its **frequency of contact with LEP persons** requiring LPR applications by calculating:

- The volume of LPR translation requests in languages other than English,
- The volume of LPR application downloads/web hits from the DOT website,
- The volume of literature requests,
- The volume of requests for telephonic interpretation/translations generated at one of DOT's eight Public Service Centers and through walk-in customers at various DOT sites,
- The volume of in-person interpreters requested when DOT is organizing or being represented at community events,
- The volume of translated LPR forms submitted to DOT for processing,
- The volume of in-person submittals of translated LPR forms at DOT's Public Service Centers

3) Factor 3: The Nature and Importance of the Program, Activity, or Service Provided by the Program to People's Lives

DOT provides LPR's to members of the public, businesses, organizations, and large corporations. To evaluate the **nature and importance of providing translated LPR's to people's lives**, consideration must be given to the broad range of requests received: most importantly, applications for Parking Permits for People with Disabilities (PPPD) from New Yorkers (and their caregivers) who are in most need of parking access due to their severe mobility impairments. Other applications include permits to contractors who are completing vital street and sidewalk work and repairs (approximately 750,000 permits issued annually), intercity commuting matters, bridge access, and parking permits for clergy and not-for-profit organizations.

4) Factor 4: Resources Available to the Agency

DOT's newly reorganized CSLACU utilizes a toolbox of **available internal and external resources** to assist LEP persons in accessing translated LPR applications in any of the top ten languages. Citywide Language Bank Volunteers and bi-lingual DOT employees are also available to assist LEP individuals in completing translated LPR applications and in-person requests at one of DOT's Public Service Centers. CSLACU staff also utilizes LanguageLine (an available translation service contracted by DCAS) to translate completed LPR applications into English for processing, which then undergoes a secondary translation review for quality assurance and translation accuracy. CSLACU also works closely with DOT's IT & Telecom Division and Strategic Communications Unit to improve the efficiency of DOT's public facing website, resource portals, and public graphic and digital communications.

Using the foregoing analysis as a guide, DOT will implement LPR compliance with Local Law 30 and Executive Order 120 through the following phases:

Phase I

Following identification by the Mayor's Office of 26 LPRs, CSLACU communicated with all relevant Operational Units to ascertain the status (active/inactive) of each LPR form and to additionally identify any other LPR forms in current use. Once identified, each application underwent plain language review and was analyzed to determine if/how translation would be approached. We confirmed that there are a total of 40 applications (totaling 51 documents) which must be translated to the ten Citywide Languages under LL 30. All current LPR applications and forms were uploaded to the LL30 Airtable by the January 15, 2020 due date.

Also as part of this initial phase, an agency-wide email was sent on February 7, 2020 informing all DOT staff of the upcoming availability of translated LPR applications in ten languages both on DOT's website and in hard copy. This email also renewed CSLACU's efforts to recruit new Language Bank Volunteers (LBVs).

Phase II

Each application was catalogued and processed into LAD before being sent to LanguageLine for translation. A total of 510 translated documents are expected to be completed and submitted to DOT by March 6, 2020.

CSLACU has procured a new contract for second reviews of translated materials. Currently, we expect all document reviews to be completed by April 30, 2020.

Some applications exist only as online applications and cannot be feasibly translated, such as the Intercity Bus Permit application (must be submitted via on-line NYCPermits application), Not-for-Profit parking permit and PPPD city renewal application (both must be submitted on-line via e-permits application). For these applications, we are developing an internal Standard Operating Procedure (SOP) to guide PSC employees on the most effective way to assist LEP customers in need of assistance with online applications. All guidance documents will include contact information for appropriate Language Bank Volunteers.

Phase III

CSLACU has begun working with DOT's IT Unit and Strategic Communications Office on redesign of DOT's home page to include an easily accessible multilingual portal for translated LPR documents. This will provide an easy to find and use access portal for obtaining translated versions of all LPR applications. IT will create and upload URL links for each translated LPR document (510 total) into the newly created portal. Completion of this step is expected by April 30, 2020. Staff from CSLACU will engage in testing of the new portal alongside the IT Unit and Strategic Communications Office. Additionally, all 510 translated documents will be made available through 311, as part of DOT's Literature Request list.

Phase IV

CSLACU is currently developing internal guidelines, SOP's and training procedures for NYCDOT staff, related to the introduction of LPR applications in languages other than English. The new guidelines will focus on allowing staff to:

- provide comprehensive assistance to LEP customers in their preferred language when submitting applications,
- quickly obtain English-translated versions of applications submitted in one of the designated Citywide Languages,
- minimize any additional wait times for LEP customers.

CSLACU will be instituting routine visits to each of the Service Centers for training (both initial and periodic "refreshers") and to ensure that each center is supplied with all relevant documents in each of the designated Citywide Languages. We will conduct training with all operational units which will be impacted by the introduction of applications in languages other than English. These Units include: Parking Permits for People with Disabilities (PPPD), the Office of Construction Mitigation and Coordination (OCMC), Staten Island Ferry, Division of Bridges, Highway Inspection and Quality Assurance (HIQA) and the Bureau of Permit Management and Construction Control.

Staff in these Units will be trained on SOP's for receiving non-English applications, and requesting expedited translation of the application information into English so that the application may be processed and appropriate licenses, permits or registrations furnished to the customer. To this end, we are updating and re-organizing the Language Bank Volunteer (LBV) List. This re-organization will focus on identifying LBV's staffed at or near each service center. Organizing the list with LBV proximity to each center will allow for near-immediate translation of received applications and in-person translation assistance.

CSLACU is also in the process of procuring tablets (iPad/Android) to be available at each of the Public-facing service centers for assistance with translation and interpretation. These tablets will be outfitted with Language Line's InSight application, which provides immediate access to interpreters via video chat function. This service can be used to:

- communicate information regarding the application process to LEP customers,
- provide more substantial interpretations when an LBV is not available,
- provide verbal translation of application information to both LEP Customers and DOT Staff, when an LBV cannot be available quickly.

Section 6: Training

(Refer to §23-1102 b.(8))

Identify the agency's progress in developing training on laws, agency policies, and protocols on language access, and in delivering training to staff.

- DOT operational managers who oversee DOT's Public Service Centers (PSCs) received links to Local Law 30 and were apprised of LL 30's LPR mandate.
- An agency-wide email was sent to all DOT staff were instructing them on how to use LAD's portal to easily access document translation and interpretation services. This same method was posted on DOT's internal SharePoint.
- The PSC personnel have been trained to provide LEP customers with dual phone lines connecting them to LanguageLine Solutions interpretation services.
- DOT Street Ambassadors coordinate with the In-Person Interpreters at their outreach events and introduce them to LEP customers and assist the customer in understanding the activity.
- DOT Street Ambassadors work with the Accurate Communications In-Person ASL Interpreters at their outreach events and introduce them to customers requiring ASL assistance to understand the activity.
- In an effort to better determine the language proficiency of DOT's field workers, CSLACU produced a Work Zone Safety survey that was distributed on November 28, 2019 to field workers in the Sidewalk Inspection Management (SIM), Roadway Repair and Maintenance (RRM), and the Bridges Divisions. All of the surveys were returned by December 20, 2019. The purpose of this survey was to determine the need for Work Zone Safety training in additional languages.
- Future training of operational managers is being planned for roll-out of the new DOT LPR web portal as well as LAD.
- In compliance with LL 30, CSLACU is developing internal guidelines, SOP's and training procedures for DOT staff, related to the introduction of LPR applications in languages other than English. A training session for all PSC employees and LBVs has been scheduled for April 3, 2020.
- On May 8, 2020, CSLACU is conducting an LPR Orientation for PSC staff and LBVs, introducing LL 30 and the LPR mandate, a presentation on multi-lingual translation procedures, and utilizing the new LAD.
- CSLACU will conduct on-site training and follow-up sessions with all operational units impacted by the introduction of applications in languages other than English. These Units include: Parking Permits for People with Disabilities (PPPD), the Office of Construction Mitigation and Coordination (OCMC), Staten Island Ferry, the Division of Bridges, and Highway Inspection and Quality Assurance (HIQA). Staff in these Units will be trained with SOPs we are also developing for receiving non-English applications, utilizing LAD and requesting translation of the application information, so that it may be processed and the appropriate licenses, permits or registrations furnished to the customer.
- CSLACU will continue its routine visits to all public-facing offices and service centers. These visits will focus on training (with periodic inspections and personnel reviews) and supplying each center with documents in the ten languages required by LL 30.
- CSLACU is updating the Language Bank Volunteer (LBV) List. An email was circulated on February 7, 2020. As part of Local Law 30's mandate, CSLACU will be developing SOPs outlining best practices for DOT's PSCs to process translated LPR forms received. As part of this customer service initiative, we are seeking Language Bank Volunteers (LBVs) to assist the staff at our PSCs with the English translations of completed LPR forms that have been translated into one of the top ten languages. This does not require the LBVs to be on-site at the Public Service Center, although that would certainly help. CSLACU can use the call list that will be distributed to each of the eight PSCs. Once we have a complete list of LBVs, CSLACU will provide training for both the LBVs and the Public Service Center staff on the seamless process for providing LEP customers with the most professional and efficient service.

Section 7: Record keeping and evaluation

(Refer to §23-1102 b.(3) and §23-1102 b.(4))

Identify the progress your agency has made in record keeping of language services and monitoring the delivery and quality of language services. Include any considerations that may influence the agency's "four-factor analysis."

Factor 2: Frequency with which LEP Persons Come in Contact with the Program

In addition to the population data provided by the American Community Survey and in accordance with Executive Order 120 and Local Law 30, DOT measures its **frequency of contact with LEP persons** requiring applications by calculating:

- The volume of translation requests in languages other than English - 251
- The volume of application downloads/web hits from the DOT website – N/A in 2019
- The volume of literature requests - 365
- The volume of requests for telephonic interpretation/translations generated at one of DOT's eight Public Service Centers and through walk-in customers at various DOT sites – 1,183 calls
- The volume of in-person interpreters requested when DOT is organizing or being represented at community events
 - This number varies by community, depending on the number of separate LEP communities residing in a given Community Board: 55 requests, resulting in 171 interpreters being assigned in 2019
- The volume of translated LPR forms submitted to DOT for processing – N/A: none through PSCs, ARTS, or LAD in 2019
- The volume of in-person submittals of translated LPR forms at DOT's Public Service Centers – N/A: none through PSCs, ARTS, or LAD in 2019
- CSLACU is in the process of developing methods for surveying LEP customers that we have served.

The vehicles/tools listed below all retain valuable data that will facilitate our review and evaluation of the demand for Language Access and how to further improve LEP connectivity to DOT's outreach programs, LPRs, and commonly used documents:

Record keeping

- 311 tracks the volume of Literature Requests received
- DOT's LAD portal tracks and generates reports quantifying the volume of:
 - Document Translation Requests through LanguageLine Solutions (LLS) and LBVs
 - Over-the-phone Interpretation Requests through LLS and Accurate Communications
 - In-person Interpretation Requests can be tracked through LLS and Accurate Communications
- In-person Interpretations were tracked in-house on an Excel spreadsheet during 2019
- In-person Interpretations will be tracked by LAD in 2020
- DOT's Agency Resource Tracking System (ARTS) is capable of tracking language service, but was not utilized for this purpose during 2019

Evaluation

- CSLACU Quality Assurance is conducted
- LanguageLine provides three levels of translation reviews
- CSLACU is in the process of developing methods for surveying LEP customers served.

Section 8: Resource analysis and planning

(Refer to §23-1102 b.(11))

Identify the progress your agency has made in managing its language access resources (including staff and contracted services) to facilitate and/or improve language access. Include any considerations that may influence the agency's "four-factor analysis."

Factor 4: Resources Available to the Agency

DOT's newly reorganized CSLACU utilizes a toolbox of available internal and external resources for LEP persons to access translated documents in any language required, LPR applications in any of the top ten languages, and in-person and telephonic interpretations :

- **Internal Resources Utilized in 2019:**

- CSLACU's new configuration is as follows:
 - Language Access Coordinator/Administrative Staff Analyst who evaluated Language Access services and processes previously used to assist LEP customers and has added and continues to implement process improvements. Ongoing analysis of new procedures will inform future actions, and a new
 - Community Coordinator is working with existing staff to implement operational improvements
 - Language Access's previous Executive Director has transferred to another DOT Operational Unit and her tasks have been divided amongst these new employees.
- During 2019, Language Access had two Community Associates
 - The Spanish bi-lingual associate participated in the Future Leaders Program at DOT, increasing her knowledge of DOT operations and improving her ability to communicate that information to LEP customers. Associate translated documents into Spanish and helped to create a Spanish language glossary of commonly used transportation-related terminology
 - The Chinese bi-lingual associate participated in DOT's Leadership Academy, increasing his knowledge of DOT operations and improving his ability to communicate that information to LEP customers. Associate translated documents into Traditional and Simplified Chinese, provided Chinese interpretation at DOT outreach events, supervised three Chinese language college interns, and helped to create a glossary of commonly used transportation-related terminology in both Traditional and Simplified Chinese
 - Coordinated the list and participation of Language Bank Volunteers, submitted ARTS requests to LAD for translation services, and supervised literature requests
Monitored and responded to literature requests
 - Six Interns: 1 Russian, 3 Chinese, and 2 Computer Science, one of whom conducted Arabic-language reviews
- DOT and City-wide Language Bank Volunteers have provided document translation services, in-person and telephonic interpretation services

- **External Resources Utilized in 2019:**
 - CUNY Partnership provided all Language Access interns
 - Language Access staff also utilized the following external vendors:
 - LanguageLine Solutions, a translation service contracted by DCAS, translates documents and provides in-person interpretation services.
 - Leticia Molinero Translation Studio conducts secondary translation reviews for quality assurance and translation accuracy.
 - Accurate Communication Services provides ASL interpretation services within DOT operational units and at DOT outreach events.
 - Karen Schriver and Associates had conducted preliminary plain language services for Language Access, as mentioned in the plain language section of this report.

Section 9: Outreach and public awareness of language access services

(Refer to §23-1102 b.(9))

Identify the progress your agency has made in implementing strategies and outreach activities that will create public awareness of your agency's language assistance services.

NOTE: This item refers to strategies and outreach activities specifically about the availability of language assistance services provided by your agency, *not* multilingual outreach about your agency and its services or program.

STRATEGIES

DOT's External Website:

- DOT's external website is undergoing a complete redesign. CSLACU will improve the process for LEP customers to have easy access to LPR documents in the top ten languages. CSLACU is working with IT to create a public-facing landing page showcasing this new translation service.
- The LPR portal will provide the following services:
 - LEP customers will have direct access to all LPRs in the language of their choice;
 - Once the customer selects their preferred language, they will have the option of selecting from a total of six categories, each containing all translated LPR applications; and
 - LEP customer will also have access to DOT's translated Essential Documents through this portal.

Public Outreach:

- Local Community Boards are advertising Language Access services at specific DOT outreach events in newspapers written in the languages prevalent in their communities
- The eight DOT PSCs provide the following services:
 - Prominently displayed signage describing the availability of language services in the top ten mandated LL 30 languages;
 - Dual phone lines offering language interpretation services to LEP customers through LanguageLine Solutions and ASL services through Accurate Communications; and
 - During 2020, DOT will institute the use of i-Pads or Androids at PSCs to allow LEP customers to video-conference with off-site translation service providers.

Section 10: Language Access complaints

(Refer to §23-301 and §23-1102 b.(10))

1 - Describe how members of the public can submit language access complaints, questions and requests to the agency (in addition to making a complaint via 311).

The public can submit complaints or concerns either through the “Contact the Commissioner” link on the DOT external website or by calling 311 or visiting 311on-line.

2 - How many *language access complaints* did the agency receive via 311 during CY19? Describe how each of these complaints were resolved.

Language Access/DOT did not receive any complaints from LEP customers through 311, LAD, ARTS, or through the external and internal NYCDOT websites.

3 – How many *language access complaints* did the agency receive via channels other than 311 during CY19? Describe how each of these complaints were resolved.

DOT’s previous Language Access Unit, now CSLACU, received two recommendations from the Mayor’s Office of Operation (MOO) Secret Shopper program on July 18, 2019. At our Public Service Centers (PSCs) at 55 Water Street in Manhattan and 16 Court Street in Brooklyn, the DOT staffers were unable to direct the LEP/Secret Shoppers to the dual set phone to telephone Language Line for translation services, despite clear signage indicating the availability of LEP services. All of the Public Service Center liaisons will receive comprehensive retraining on the array of language services available. LPR training will be included, as well.

The MOO Secret Shoppers were the only external people to lodge any Language Access complaints during 2019.

4 - How many *requests for language access services** did the agency receive through 311 during CY19? How were they handled?

Telephonic access to 311 is encouraged through the use of posters at all Public Service Centers and palm cards advertising the availability of interpretation. 311 online is utilized by customers to request DOT documents, not for accessing Language services. DOITT deployed the 311 Dynamics System in July of 2019. A total of 365 non-English language documents were sent to LEP customers during CY 2019.

5 - How many *requests for language access services** did the agency receive through channels other than 311 during CY19? How were they handled?

DOT did not receive any public requests for translation services from LEP customers through DOT’s external Webform page, “Contact the Commissioner. In 2019, the following types of LEP customer requests for language access services were addressed:

TYPE OF LANGUAGE ACCESS SERVICE (IN-HOUSE)	CY 2019 # OF REQUESTS
DOCUMENT TRANSLATION	251
TELEPHONIC INTERPRETATION	1,183
IN-PERSON INTERPRETATION	14
AMERICAN SIGN LANGUAGE (ASL) INTERPRETATION	4
TOTAL	1,452

6 - Describe the agency's efforts to ensure public awareness of the 311 Language Access complaint system.

Each of DOT's Public Service Centers have posted explicit signage in the top ten languages required by Local Law 30 explaining the availability of language services for LEP customers to express their requests, concerns, or complaints. The PSCs also distribute palm cards advertising the availability of 311 and the DOT website for obtaining translated documents. Free interpretation services are also offered on these palm cards which are available in: Arabic, Korean, Bengali, Polish, Traditional Chinese, Russian, French, Haitian Creole, Spanish, Urdu, Italian, and Yiddish. In addition, LEP customers may access language services in up to 73 languages by clicking on the "Contact the Commissioner" link from the DOT external website.

***NOTE: "Requests for additional language services"** refers to new ways in which the agency can make its services or information available to those who do not read or speak English well – e.g., translating a specific brochure into additional languages, or providing bilingual staff at a particular service facility. It does NOT refer to individual requests for interpretation.

Section 11: Language Access Goals

List your agency's language access goals for Calendar Year 2020.

CSLACU's main goal for CY 2020 is to continue to develop efficient and comprehensive methods for providing a full range of language services to LEP New Yorkers.

- Complete LPR translations, reviews and addition to new DOT website portal:
 - LPR documents have been sent to Language Line, completed translations will be received by February 28, 2020
 - Translated LPR's (510 documents) will be sent for review and will be completed by March 30, 2020
 - DOT website LPR portal and testing of pages and links will commence once the links have been uploaded.
 - Training of PSC staff and LBV's is scheduled for May 8, 2020. Continued training of Public Service staff to follow and continue throughout 2020
- Review remaining contracts and finalize new contracts for review and plain language services
- Continue development of CSLACU's In-house Glossary of Commonly Used Transportation-related Terminology, currently available in Spanish, Traditional Chinese, and Russian. To be expanded to the additional seven languages mandated in LL 30. Share DOT's Glossary of Transportation Terminology with MOIA and assist in developing a city-wide Glossary
- Assist MOIA in developing a comprehensive city-wide Scope of Work for the new DCAS Translation Services Contract
- Continued review of Essential Documents will be ongoing to ensure that all documents are current and that new or revised documents are added as needed. The below process will be in place:
 - New and revised documents will be converted to Plain Language and translated.
 - New and revised documents will be added to the LPR web portal. CSLACU will also consider adding a separate portal for Essential Documents.
 - Quarterly follow-up with Operational Managers to confirm that existing Essential Documents are current and obtain new documents to translate and add to our available Essential Documents. **THIS SECTION IS NEW**
- Enhance training and communication of Language Access policies to DOT staff:
 - Establish new training protocol, including routine refreshers, for PSC staff.
 - Create and distribute a CSLACU Quarterly Newsletter to all DOT employees. The newsletter will serve as a reminder of CSLACU policies, notification of new developments and a recruitment tool for new LBV's.
- Upgrades to LAD:
 - Improved user experience and interface
 - Agency-wide notifications
 - Increased training for submissions of translation/interpretation requests
- Expansion of the use of Verizon Message Boards to be installed at DOT Public Service Centers. This will create geographically and demographically targeted communications and increase the Agency's reach.
- Institute the use of tablets (iPads/Androids) at PSCs to allow LEP customers to video-conference with off-site translation service providers

Addendum: Reporting questions for Local Law 73

(Refer to §8-1007 and §8-1008 d. of the Administrative Code)

***Note:** This section applies only to those agencies covered under Local Law 73: ACS, DHS/HRA, and DOHMH.

1 - Record the number of LEP individuals served during Calendar Year 2019, disaggregated by primary language; agency contractor, contractor, or agency office *[HRA only]*; and assistance type required. *[Add rows as needed]*

Language	Agency contractor, contractor or agency office <i>[HRA only]</i>	Type of assistance required (<i>translation; telephonic interpretation; onsite interpretation</i>)	2019 Language Services instances (<i>number</i>)

2 - Record the number of bilingual and interpreter personnel employed by the agency, broken down by language translated or interpreted. *[Add rows as needed]*

Language	Number of staff

3 – How does the agency assess whether primary language determinations are properly recorded?

Enter text here.

4 – How does the agency assess whether documents are translated accurately and disseminated properly?

Enter text here.