



## Language Access Implementation Plan (2024)

The Language Access Implementation Plan explains how the agency will provide services to people who have limited English proficiency (LEP).

**Agency name:** New York City Taxi and Limousine Commission (NYC TLC)

**Language Access Coordinator name:** Jinsuk Moon

**Language Access Coordinator title:** Language Access Coordinator/Continuity of Operations Liaison

**Published date:** June 7, 2024

[https://www.nyc.gov/site/tlc/about/language\\_access.page](https://www.nyc.gov/site/tlc/about/language_access.page)

This Plan includes information about:

1. Agency Mission and Services
2. Agency Language Access Policy
3. Language Access Needs Assessment
4. Notice of the Right to Language Access Services
5. Provision of Language Access Services
6. Resource Planning
7. Training
8. Continuous Improvement Planning
9. Goals and Actions Planning
10. Appendix

## Signatures

*[NOTE: In this section, include the signature of the LAC and the agency head/ commissioner, and attach LAIP. The signatures signify that agencies will take necessary steps to advance equity and inclusion of individuals with LEP.]*

A handwritten signature in black ink, appearing to be 'Jin Moon', written over a horizontal line.

---

Jin Moon, Language Access Coordinator, Taxi & Limousine Commission 6/7/24

A handwritten signature in black ink, appearing to be 'David Do', written over a horizontal line.

---

David Do, Chairperson/Commissioner, Taxi and Limousine Commission 6/7/24





## **Section 1. Agency Mission and Services**

The New York City Taxi and Limousine Commission (TLC), created in 1971, is the agency responsible for licensing and regulating New York City's yellow and green taxi cabs, for-hire vehicles, commuter vans, and paratransit vehicles. The Commission's board consists of nine members, eight of whom are unsalaried commissioners. The salaried Chair/Commissioner presides over regularly scheduled public commission meetings and is the head of the agency.

The New York City Taxi and Limousine Commission (TLC) is committed to regulating accessible, reliable, and safe transportation options for all New Yorkers. A large part of this involves recognizing and addressing the needs of our licensees, including those who have limited English proficiency (LEP). TLC licensees reflect the diversity of New York City, with 93% of the population born outside of the U.S. speaking more than 100 different languages. The agency communicates and interacts with our licensees and members of the public both in-person and virtually by email and social media.

Some of the services offered by the different divisions of the agency include the following:

- **Licensing and Standards**

TLC's Licensing and Standards Division processes various transactions relating to licensing and compliance. All units within the division work together to provide licensing support throughout the agency. The division also includes the call center, which addresses inquiries directed to the agency that range from questions about applying for a TLC license and what to do after leaving property in a taxicab to commending a TLC-licensed driver for superior behavior or exemplary service. This unit is also responsible for developing driver education and training curriculums, auditing education providers, and overseeing the examination process.

- **Policy and Community Affairs**

The Office of Policy provides administrative guidance and spearheads new projects and initiatives within the TLC. Policy manages and conducts large research projects and pilot programs, such as FHV Accessibility and the Flexible Fare Pilot. Policy research focuses on the core areas of TLC's regulatory power—ensuring safety, accessibility, and accountability—utilizing taxi and for-hire vehicle trip data and administrative data on drivers and vehicles. The Office of Community Affairs (OCA) is the Taxi and Limousine Commission's primary public-facing unit. The office works to answer non-licensing-related correspondence, interfaces with elected officials and sister city agencies, and provides language access services to the agency. Importantly, the team works closely with the Office of Policy to keep licensees, industry stakeholders, and the riding public up to date on agency rules and initiatives.

- **Safety and Emissions**

The TLC Safety and Emissions Division conducts inspections of TLC-licensed vehicles. Each year, the team conducts over 153,000 vehicle inspections. Located in Woodside, the Safety and Emissions facility is a New York State licensed inspection facility, testing for all NYS-required safety and emissions elements such as properly functioning brakes, seatbelts, lights, suspension components, and emission systems. Additionally, vehicles are inspected for all TLC-required equipment and markings, such as taximeters in yellow and green cabs and base markings on livery vehicles. Only vehicles that successfully pass TLC inspection can be used to transport passengers for hire.

- **Enforcement**

The Enforcement Division of the Uniformed Services Bureau (USB) is a specialized law enforcement division comprised of peace officers who are designated as NYC Special Patrolmen. The primary mission of enforcement is to maintain public safety by deterring the illegal operation of unlicensed vehicles and ensuring compliance with all TLC rules and regulations, vehicle traffic laws, the Administrative Code, and NYC rules and regulations within its jurisdiction. Officers perform on-street enforcement of TLC-licensed drivers and vehicles as well as unlicensed for-hire operators who pose a serious threat to public safety. In addition to its on-street enforcement role, the division also ensures compliance with applicable TLC rules by taxi garages, FHV bases, taximeter shops, and driver education schools.

- **Finance**

TLC's Finance Division is responsible for overseeing the agency's budget, procuring goods and services, and managing accessibility programs. The division includes the Owner Driver Resource Center, where licensees can seek free financial counseling, legal services, and other useful resources. The unit also manages the Taxi Improvement Fund (TIF), which supports medallion owners and drivers that place accessible vehicles on the road to ensure that all customers have equitable access to taxi transportation services. Within the Finance Division, the Cashier's Unit is responsible for receiving payments, issuing receipts, and maintaining and keeping track of all monetary transaction records.

- **Office of Inclusion**

The Office of Inclusion was created by the Taxi and Limousine Commission in response to Local Law 219 of 2018 to ensure that the riding public receives equal and courteous service from taxis and for-hire vehicles. The unit's main goals are to reduce service refusals, end discrimination by TLC-licensed drivers, develop and implement anti-bias training for TLC-licensed drivers and bases, advocate for drivers who have been

victimized by crime, and track and monitor crimes committed against TLC-licensed drivers.

- **Legal**

The Legal Affairs Division is the agency's in-house legal counsel. The division provides legal advice for the various divisions at the TLC. The Legal Affairs Division also drafts agency rules, executes agreements, enforces rules, and works on litigation with the New York City Law Department. Additionally, it is responsible for hosting public hearings and meetings and making available the agency's rules on the agency's website. The Prosecutions Division investigates and litigates all violations and summonses. The Driver Protection Unit investigates complaints submitted by TLC licensees that allege that they have been subjected to illegal conduct, including failure to pay drivers what they earned by providing a trip, failure to return a driver's security deposit, failure to provide drivers copies of documents required under TLC rules, including leases and receipts, overcharges of lease or vehicle purchase amounts, acts of identity theft, and retaliation for filing a complaint with the TLC. The unit also reviews TLC rules to improve drivers' rights and regularly provides drivers' rights trainings throughout New York City.

- **Public Affairs**

The Public Affairs Unit is the point of contact for news media, organizations, and the general public seeking information about agency programs, policies, procedures, and services. This unit is also responsible for handling press requests, updating digital content on the agency's website, creating and publishing social media content and promotional posts across all social media platforms, and monitoring all agency social media channels.

## **Section 2. Agency Language Access Policy**

TLC's Language Access Coordinator is located within the Office of Community Affairs, TLC's primary public-facing unit. It is the goal of the TLC to ensure that LEP individuals are able to access agency services, participate in agency decision-making, and understand agency notices. Comprehensive language access services at TLC will augment the ability of consumers to understand their rights as passengers, licensees to navigate the agency's regulations, and applicants to apply for TLC licenses. This language access plan will guide the provision of equitable services at TLC by reinforcing protocols and procedures for:

- Providing phone and in-person interpretation to all individuals with limited English proficiency.
- Maintaining multilingual signage advertising the availability of free interpretation services at all public-facing facilities.
- Translating the most commonly distributed documents and communications containing essential licensing and passenger safety information into the 10 designated citywide languages under Local Law 30.
- Identifying language needs in all outreach efforts and providing language services at public and community events.
- Training all public-facing staff on how to provide language access services to individuals with LEP.
- Allowing family members, friends, or other people to provide interpretation on non-complex issues that require a quick response.
- Keeping a list of multilingual staff.

## **Section 3. Language Access Needs Assessment**

TLC's assessment of its translation and interpretation needs is guided by the United States Department of Justice's (DOJ) 4-Factor Analysis and the requirements described in Local Law 30 and Executive Order 120.

### **Factor 1: The Number or Proportion of LEP Persons in the Eligible Service Population**

TLC-licensed drivers represent the largest category of the agency's licensees, numbering over 177,000. Many of these drivers also hold additional TLC licenses (for example, drivers often own the vehicles they operate and are licensed as drivers and vehicle owners). TLC-licensed drivers reflect the diversity of New York City. Professional drivers are born in dozens of countries and speak over 100 different languages. Over half of all TLC-licensed drivers hail from five countries: Bangladesh, Pakistan, India, the Dominican Republic, and China. Over 85 percent of drivers live within the five boroughs, predominantly in Queens and Brooklyn. Other than English, the most common languages spoken by TLC licensees are Spanish, Bengali, Chinese (Cantonese and Mandarin), Arabic, Russian, Urdu, French, Hindi, Nepali, and Punjabi. The data on commonly spoken languages are tracked through calls made to the agency via our telephonic interpretation vendors Language Line and Voiance.

### **Factor 2: The Frequency with Which LEP Individuals Come into Contact with the Agency**

TLC staff interact with the public in person at TLC's Customer Service Center in Long Island City, Queens; at the Safety and Emissions Inspection Facility in Woodside, Queens; at citywide outreach events; and on the road during routine enforcement. Additionally, staff interacts with members of the public over the phone, by email, through social media, and through the agency's publications and website. While TLC has reduced the need for most licensees to appear in person, certain transactions still need to occur at TLC offices. The Licensing Division alone served over 69,625 customers in CY 2023 at the Customer Service Center. At the inspection facility, TLC staff performed 113,362 vehicle inspections in CY 2023. Additionally, both TLC's Licensing and Prosecution Divisions provided telephonic interpretation for 17,251 calls in over 30 languages in CY 2023. The Office of Community Affairs (OCA) sends informative emails, available resources, industry notices, and agency updates to licensees throughout the year. Additionally, staff shares information through TLC's website and social media, informing drivers in a wide variety of ways. Outside of the 10 designated citywide languages required under Local Law 30, drivers have requested Georgian, Nepali, Punjabi, and Uzbek.

### **Factor 3: The Importance of the Benefit, Service, Information, or Encounter to the LEP Person**

TLC is the regulatory agency tasked with creating and maintaining rules for the operation of taxis and for-hire vehicles, as well as safeguarding the rights of the riding public. Failure to provide language access services to the LEP population would negatively impact our licensees and a broad section of the traveling public. Language Access is important because it ensures that individuals with limited English proficiency are informed of, able to participate, and gain



access to and benefit from the services, programs, and activities offered by the agency in a meaningful way. By providing adequate language access services, we can help our licensees obtain and maintain a license with the TLC.

**Factor 4: Available Language Access Resources**

TLC relies primarily on language services vendor contracts for document translation and telephonic, in-person, and virtual interpretation to provide necessary language access services. TLC has a dedicated Language Access Coordinator within the Office of Community Affairs and maintains a list of bilingual staff in public-facing units that can provide interpretation for situations that require a quick or immediate response. TLC also relies on multi-lingual staff to engage directly with LEP New Yorkers at TLC offices and in the field.

## **Section 4. Notice of the Right to Language Access Services**

TLC displays “Interpretation Services Available” signage in prominent locations at all of its public-facing facilities that provide “Point to your language. An interpreter will be called.” instructions in 24 languages and states that interpretation is available at no cost. The agency’s Language Access Coordinator periodically visits public-facing facilities to monitor the condition and placement of the signs to ensure compliance.

In 2023, TLC started a monthly pilot outreach program called TLC Mobile Van Hailin', which has successfully become a fully functioning agency initiative after 10 months. By combining teamwork, exceptional customer service, and collaboration with various units within the agency, the initiative brought the agency’s services to the licensees in their own communities across the five boroughs, creating a one-stop shop for all services offered at our licensing office.

During the initial planning stage, the Office of Community Affairs utilizes the NYC Population Fact Finder to survey the demographics and languages commonly used or spoken in the community district where the event is taking place and plan language needs accordingly (bilingual staff, interpreters, phone interpretation, translated materials, etc.). This ensures that culturally and linguistically appropriate strategies are implemented when providing services to both licensees and members of the public who are non-English speakers or have limited English proficiency. The Language Access Coordinator is also present at community outreach events to assist in identifying individuals with LEP and to provide interpretation services through bilingual staff, translation apps, and by phone. Multiple signs displaying the availability of interpretation services are also clearly posted in highly visible locations.

## **Section 5. Provision of Language Access Services**

### **A. Interpretation**

TLC currently uses the vendor Language Line Solutions, which provides telephonic interpretation in over 240 languages. All TLC staff members have access to telephonic interpretation services from any TLC telephone or TLC mobile device. The Language Access Coordinator provides training on how to access telephonic interpretation services, and instructions are also available on the agency's intranet site. Additionally, phone labels on how to access an interpreter by phone are posted near staff working stations. Both in-person and virtual interpretations are done consecutively. This is a way of interpreting in which the speakers make a speech or say a few sentences while the interpreter listens in and takes notes. The interpreter then reproduces what the speaker has said for the audience. The Language Access Coordinator handles all forms of communication with the interpreter regarding instructions and other inquiries through the primary vendor. Staff must submit all interpretation requests via the Language Access Request Form at least one week prior to the date of the event. Cancellation requests must be sent to the Language Access Coordinator 48 business hours prior to the assignment or event.

As of July 2023, the TLC also has a secondary phone interpretation provider, Voiance LLC., for situations where the primary phone interpretation vendor cannot provide services. While the TLC does not have exact data on the number of LEP drivers, we will continue to devote resources to translating essential documents into the 10 designated citywide languages. While Hindi and Punjabi are not included in the 10 designated citywide languages, they are commonly spoken languages by TLC-licensed drivers, in addition to Georgian and Nepali, which are also frequently requested.

All TLC staff working in public-facing units or who interact and communicate regularly with the public (Base and Business Unit, Vehicle Unit, Driver Licensing Unit, Call Center, Counter Operations and Customer Service Unit, Compliance Unit, and External Affairs) must adhere to the following:

- Know how to access telephonic interpretation services from your office or work phone.
- Have the agency's client ID or account number and the respective unit's access codes readily available. Stickers or decals on how to access an interpreter should be posted on office or work phones. Reach out to TLC's Language Access Coordinator for an access code.
- Use headsets equipped with microphones when accessing and providing telephonic interpretation services. The customer will use the handset of the phone at the facility. For three-way conversations, the agency will consider investing in extra handsets if there is a need. If headsets and TLC telephones are not available or cannot be accessed by members of the public, consider assisting the LEP customer through bilingual staff, translation apps, or dialing in an interpreter through a TLC mobile device. For situations

that are more complex, reach out to the agency's Language Access Coordinator for further guidance.

- Do not have a conversation on the speakerphone when providing telephonic interpretation services in public spaces. Staff must ensure that any content and sensitive information discussed are not shared out loud with others.

## **B. Translation**

TLC uses the services of International Language Services, Inc., a minority and women-owned business enterprise (M/WBE) certified with the City of New York, to translate the most commonly distributed English documents and communications. TLC staff trained in plain language best practices review and edit all public-facing documents before they are translated. As part of this review, TLC staff also determines whether the content is "essential" (information necessary to obtain or maintain a TLC license) and, as such, should be translated into the 10 designated citywide languages and additional languages based on our licensee population. Additionally, the language vendor follows plain language guidelines to the extent possible, and linguists are advised to mimic the tone of the source materials so the translations stay true to the original documents.

All emails and forms of communication sent out to licensees are translated into the city's 10 designated citywide languages and Punjabi to ensure effective outreach, engagement, and communication with LEP communities. In addition to securing interpreters through the contracted vendor, TLC's multilingual outreach staff are also frequently assigned to attend outreach events based on their language skills and the anticipated language needs of the audience and the community.

Some examples of documents and communications translated into the 10 designated citywide languages include:

- Essential licensing guides, forms, applications, and checklists
- Licensee-wide email blasts about TLC rules and regulations
- Industry notices explaining new TLC rules and policies
- TLC Driver License Exams and Renewal Course
- Citywide distributed passenger informational materials (e.g., palm cards, flyers, videos, etc.) about TLC's accessible dispatch, safety, service refusal, and other agency initiatives.

For examples of documents commonly distributed to the public and translated into the 10 designated citywide languages that contain or elicit important and necessary information regarding enforcement of the laws and rules by the agency, please see exhibits A, B, and C in the Appendix under Section 10.

TLC frequently works with bilingual staff, staff from TLC-Approved Driver Education, and staff from industry stakeholders to ensure the quality of all our translated materials. Our reviewers are a mix of native speakers, bilingual, or highly proficient in the target languages, and many have years of experience translating and working in the for-hire industry. Moreover, to review high-profile documents and communications, such as our required Driver Education Exam, TLC has contracts with consultants certified by the American Translators Association (ATA) for all 10 languages. Using a licensed translator, the TLC's Public Affairs unit translates all industry notices—critical notices that get distributed to all TLC licensees—in the 10 languages most spoken by TLC licensees. TLC also regularly engages with ethnic and community media through our media distribution list. The agency recently adopted a new policy of switching press releases from PDF to HTML format, which now allows all press releases to be translated into numerous languages through the built-in translator on TLC's website.

### **C. Digital communication**

TLC has built-in translators available on its website. Industry notices are distributed to TLC licensees with translations in the 10 designated citywide languages via a licensed translation service. TLC communicates with City Hall to identify new ethnic and community media (ECM) outlets as well as maintain a distribution list of ECM outlets. TLC's Public Affairs unit also works with the IT department and our Disability Service Facilitator to audit the agency website to increase accessibility and address any issues. As mentioned previously, the TLC works with a licensed translation service to ensure the quality of the translation of digital communications.

### **D. Emergency communications**

While NYC Emergency Management (NYCEM) and other agencies may provide guidance and lead large-scale emergency responses, TLC has a bank of translated language for emergency communications that require quick dissemination. For emergency messages that go beyond those of the current bank language and that require a quick turnaround, the TLC utilizes expedited translation services through its contracted language services provider. During an emergency, the Language Access Coordinator will work closely with the TLC's Office of Community Affairs (OCA) and the agency's Emergency Management Liaison to make every effort to disseminate emergency communications in a timely manner that will be available and accessible in the 10 designated citywide languages.

The TLC has the following emergency communications translated into the 10 designated citywide languages:

- Con Edison Power Outage
- Conserve Energy Voltage Reduction
- Flood Advisory
- Hurricane
- Severe Thunderstorm Warning
- Tornado Warning
- Traffic Delays
- Travel Advisory
- Winter Storm Warning

The TLC is required to have the capability to maintain continuous operations in accordance with the City of New York's Continuity of Operations (COOP) program, whereby city agencies will have in place viable and executable COOP plans to ensure the performance of their essential services during emergencies. This includes information on both primary and alternate operating facilities, as well as the continuity of management and decision-making authority of senior leadership in the event that senior leadership or technical personnel are unavailable or incapacitated. TLC has identified the agency's essential services that must not be interrupted or must be rapidly and efficiently resumed within 12 hours following any emergency or significant disruption.

Although the impact of an emergency cannot be predicted, planning for operations to continue for a minimum of up to 30 days can mitigate or reduce any negative impact on TLC's core mission. To ensure this capability, TLC has prepared a COOP plan with an all-hazards approach to use as a management framework that will establish operational procedures and guide the restoration of essential services regardless of the nature of the disruption. The agency's Language Access Coordinator, Jin Moon, serves as the point person for the coordination of language access during an emergency in situations when there is a sudden increase in the need for language access services in a language other than the city's 10 designated citywide languages and works closely with the agency's emergency management liaison, Andrew Riley, Deputy Director of Operations.

All content and text on the TLC website is human-translated and proofread. Users with LEP are able to change their preferred language on the webpage by selecting the language from the list in the top right corner. In cases of emergencies, multilingual outreach is conducted by bilingual staff and through phone interpretation.

When required, social media can be translated through a combination of auto-translation and proofreading by TLC employees fluent in a particular language. TLC's Public Affairs unit values ethnic and community media and regularly engages with stakeholders. Numerous ethnic and community media (ECM) outlets are included in our distribution list, and we also have an outreach strategy to expand ECM coverage. We recently worked with the Spanish-language publication *El Taxista* to include a monthly column from the Commissioner. Other than English, Spanish is the number-one language spoken by TLC licensees.

## **Section 6. Resource Planning**

To ensure equitable language access for members of the public who are LEP, the Language Access Coordinator reviews language access metrics each year to determine the sufficiency of available resources to meet the current LEP population's needs and recommend any necessary budget resource allocation changes.

### **A. Bi-/multi-lingual staffing**

Some TLC staff in public-facing units speak a language other than English. The TLC will utilize bilingual staff to provide interpretation in situations and interactions that are casual and non-complex. For all community outreach and public events, the Language Access Coordinator will use the NYC Population Fact Finder to survey the demographics and languages commonly used or spoken in the region where the event is taking place and plan language needs accordingly, whether there is a need for bilingual staff, interpreters, phone interpretation, free interpretation signage, translated materials, etc. TLC's Enforcement Unit will keep and maintain a list of bilingual enforcement officers that can be reached when an interpreter is not available or cannot be reached. TLC's Safety & Emissions (S&E) Unit will also keep and maintain a list of bilingual inspectors and the languages spoken by those inspectors. TLC staff can reach out to the Language Access Coordinator if they are interested in becoming certified in the non-English language. This will save the agency money on contracts and help develop staff talent.

### **B. Language service vendor contract**

TLC's Language Access Coordinator maintains records of the agency's language services through monthly invoices and reports from our interpretation and translation vendors. Spending for contracted services with language vendors is tracked through a spreadsheet that contains the name of the project, request date, completion date, the total price of the project, and any additional notes. TLC will use metrics from the contracted language access providers to report requests for interpretation and translation services.



TLC has the following contracts in place:

<b>Vendor name</b>	<b>Procurement method</b>	<b>Purpose of the contract</b>	<b>Language(s) provided by the vendor</b>	<b>Period of contract</b>	<b>Total award amount of contract</b>
International Language Services	MWBE Non-Competitive Small Purchase	Interpreter and Translation Services	Over 173 languages	July 1, 2022, ~ June 30, 2025	\$450,000.00
Language Line	Task Order	Telephonic Interpretation Services	Over 240 languages	June 1, 2022, ~ June 2, 2025	\$282,042.88
Voiance (CyraCom International, Inc.)	Task Order	Telephonic Interpretation Services	Over 200 languages	July 1, 2023, ~ June 30, 2024	\$1,000.00

**C. Partnership with Community-Based Organizations (CBO)**

TLC currently has no partnerships with community-based organizations (CBOs) to provide language access services to bridge the gap between the city government and community members that are LEP. The agency plans to collaborate with CBOs in the upcoming years.

## Section 7. Training

TLC's Language Access Coordinator will work with various departments across the agency to facilitate language access training for all staff who communicate regularly and directly with the public who may have LEP. Training may be virtual or in-person and includes information on complying with EO120 and LL30, the agency's language access policies, protocols for all language service requests, steps to access an interpreter over the phone, best practices for providing language access, and ways to communicate effectively and respectfully with LEP individuals.

The Language Access Coordinator regularly attends MOIA-led workshops and refresher training sessions that provide guidance on serving LEP individuals, updates on new language access laws and requirements, ensuring language access services are readily accessible and available, plain language use, and the importance of providing meaningful access to those with LEP. Periodic and on-demand employee workshops and training sessions are attended by staff in public-facing units to provide awareness of language-related resources available to the public and how to use the agency's internal Language Access Request Form.

Employees are instructed not to use instant translation apps like Google Translate when communicating with an LEP individual, and these should only be used in situations that need a quick or immediate response. Bilingual staff may only be used to provide interpretation in casual and non-complex situations. Before attending outreach and public events, the Office of Community Affairs assesses the need for in-person interpretation and ensures that there are bilingual staff that speak the language of the demographic area of the service population. At these events, individuals' preferred languages are recorded and tracked through driver intake forms.

At TLC's Uniformed Services Bureau (USB), which engages in inspection and enforcement functions, there is great diversity with respect to languages spoken by officers and inspectors. Officers within the field and inspectors in the inspection facility are aware of the additional languages spoken by their colleagues. When they engage an LEP individual and neither they nor their partner speaks the same language, they will first ask for assistance from one of their colleagues. If there is no one available who speaks the same language as that individual, they will then utilize TLC's vendor, Language Line, for which they have been trained to use.

Due to each unit's tasks and work location, language access training and protocols may vary.

### **A. Telephonic Interpretation**

All TLC staff working in public-facing units or that interact and communicate regularly with the public are trained on how to provide phone interpretation services and must adhere to the following:

- Know how to access telephonic interpretation services from your office or work phone.

- Have the agency's client ID or account number and the respective unit's access codes readily available. Stickers or decals on how to access an interpreter should be posted on office or work phones.
- Use headsets equipped with microphones when accessing and providing telephonic interpretation services. The customer will use the handset of the phone at the facility. For three-way conversations, consider investing in extra handsets.
- Never put a conversation on speakerphone when providing telephonic interpretation services in public spaces. Staff must ensure that any content and information discussed are not shared out loud with others.

TLC's Language Access Coordinator manages and keeps a daily log of telephonic interpretation requests in all languages to ensure that staff provides culturally and linguistically appropriate customer service to individuals with LEP. Ensuring the quality of language services is critical to communicating effectively with the public and TLC licensees who are LEPs.

TLC will continue to work to expeditiously resolve language access complaints and monitor all feedback and suggestions received from the public. Staff responsible for the intake and review of 311 complaints and written correspondence will forward them to the Language Access Coordinator, who will ensure these complaints are received and addressed. The agency's number of language access complaints will be included in all annual language access assessments. Any program beneficiary, program participant, or member of the public with LEP who believes that the agency's language access services have not been adequate may file a written complaint by contacting TLC's Language Access Coordinator, Jin Moon, at [Jin.Moon@tlc.nyc.gov](mailto:Jin.Moon@tlc.nyc.gov).

## **B. In-Person/Virtual Interpretation**

All in-person or virtual interpretations are done consecutively. This is a way of interpreting in which the speakers make a speech or say even a few sentences while the interpreter listens and takes notes. The interpreter then reproduces what the speaker has said for the audience. The Language Access Coordinator handles all forms of communication with the interpreter regarding instructions, additional dates, and other inquiries through the primary vendor.

Staff should submit all interpretation requests via the agency's Language Access Request Form at least one week prior to the date of the event. Cancellation requests must be sent to the Language Access Coordinator 48 business hours prior to the assignment or event.

## **C. Document Translation**

At TLC, all documents are translated into the city's 10 designated citywide languages unless requested otherwise. Agency staff will review documents to ensure that they are written in plain language with no excessive use of abbreviations, jargon, and other technical terminology

before submitting a document translation request via the agency's Language Access Request Form. When submitting a document translation request, staff should indicate the deadline or the due date and the languages that need translation. It should be noted that the standard turnaround time for document translations is typically 7–10 business days.

## **Section 8. Continuous Improvement Planning**

The TLC remains committed to developing and improving ways to maintain communications with the members of the public that have LEP. The Language Access Coordinator will periodically evaluate the agency's language access plan and policies to ensure that they work effectively for the organization and the needs of the service population. The agency will continue to collect and monitor accurate and reliable data on interpretation and translation services from all public-facing units in addition to data provided by language access providers to evaluate and assess language needs.

TLC will continue to:

- Conduct an assessment by collecting and analyzing relevant data to understand and identify the specific challenges and needs of the communities impacted by language access.
- Evaluate and improve available resources translated into the city's 10 designated citywide languages and acquire additional resources that might be helpful to LEP individuals.
- Monitor the utilization rates of the different types of language access services used throughout the agency.
- Collect preferred language data collected through driver intake forms and during intake processes for all outreach events.
- Determine whether simultaneous or in-person interpretation formats are needed for outreach events, public hearings, and other agency initiatives.
- Resolve language access complaints and suggestions submitted by individuals with LEP.
- Stay current on community demographics and collaborate with community-based organizations that specialize in providing services to immigrant and/or LEP populations that can assist with tasks that a language service might not be able to do, for example, finding and connecting with local communities, building trust and engaging with them, identifying communities with unique needs, and assisting in ensuring high quality, accuracy, and speed of language service delivery.

## Section 9. Goals and actions planning

Priority Language Access Need	Root Causes(s)	Language Access Goal
Ensure commonly distributed documents and all communication are translated in 10 designated citywide languages in addition to Punjabi.	TLC drivers speak more than 100 languages and there was an increase for demand in translations in Punjabi.	To be more inclusive of the languages spoken by TLC's driving community.
Adapt existing Language Access Training to an online/virtual platform to ensure staff unable to attend in-person trainings can receive.	All TLC staff in front-facing units must know how to provide interpretation services over the phone.	To eliminate barriers and ensure that all TLC licensees and members of the public have meaningful and equitable access to our services.
Incorporate consideration of language access in emergency notifications/communications.	Most TLC licensees have limited English proficiency (LEP), so it is important to have emergency communications translated into the languages they speak.	To ensure that emergency communications are disseminated quickly to all TLC licensees in the languages that are commonly spoken by the community.
Action Steps/ Milestones	Staff Responsible	Timeline
Continue to translate all commonly distributed documents, flyers, and written forms of communication into 10 designated citywide languages and Punjabi.  Upload and update all recently translated documents on TLC's website.	Office of Community Affairs  Licensing & Standards Division  Public Affairs Unit	Ongoing
Adapt existing Language Access Training to an online/virtual platform.	Office of Community Affairs  Operations, People & Innovation Division	2025-2027
Create and translate notices for all types of emergency communications into the 10 designated citywide languages and Punjabi.	Office of Community Affairs  Operations, People & Innovation Division	Ongoing through 2024

## Section 10. Appendix

Exhibit 1: Typical email blast sent out to licensees announcing a Notice of Public Hearing and Opportunity to Comment on Proposed Rules translated into 11 languages other than English.

May 01, 2024

### Notice of Public Hearing and Opportunity to Comment on Proposed Rules 5-8-2024

- English
- Spanish / Español
- Arabic / العربية
- Bengali / বাংলা
- Chinese (Simplified) / 简体中文
- French / Français
- Haitian-Creole / Kreyòl Ayisyen
- Korean / 한국어
- Polish / Polski
- Punjabi / ਪੰਜਾਬੀ
- Russian / Русский язык
- Urdu / اردو

#### English

Dear TLC Licensee:

The New York City Taxi and Limousine Commission (TLC) will hold an online public hearing using Zoom to solicit testimony and written comments on proposed rule packages on Wednesday, May 8, 2024, at 10:00 a.m. There will be no in person public hearing. The public hearing will be livestreamed on TLC's website at [www.nyc.gov/tlc](http://www.nyc.gov/tlc).

**This is not an OATH hearing on a TLC summons.**

Exhibit 2: Example of TLC Industry Notice translated into 10 languages other than English posted on the agency’s website.

**24 – 02 Minimum High-Volume For-Hire Driver Pay Rates to Increase 3.49% Beginning March 1, 2024**

24-02 Minimum High-Volume For-Hire Driver Pay Rates to Increase 3.49% Beginning March 1, 2024 Industry Notice 24-02 in English.

- Arabic / العربية
- Bengali / বাংলা
- French / français
- Haitian-Creole / Kreyòl ayisyen
- Korean / 한국어
- Polish / polski
- Russian / Русский язык
- Chinese (Simplified) / 简化字
- Spanish / Español
- Urdu / اردو



Industry Notice #24-02  
For Immediate Release

2/14/2024

David Do  
Commissioner/Chair  
tocommissioner@tlc.nyc.gov

Jason Kersten  
TLC Communications  
press@tlc.nyc.gov

33 Beaver Street  
22nd Floor  
New York, NY 10004

**Notice: Minimum High-Volume For-Hire Driver Pay Rates to Increase 3.49% Beginning March 1, 2024**

The minimum high-volume for-hire service driver pay rates will increase in accordance with the 2023 annual average increase in the CPI-W. Pursuant to TLC Rule § 59D-22(a)(4), a 3.49% increase in the minimum per-mile and per-minute rates will be effective beginning March 1, 2024 for all trips dispatched by high-volume for-hire services, currently Lyft and Uber.

Including the utilization rate, the following minimum pay rates will be in effect:

- Non-WAV per mile: \$1.360
- Non-WAV per minute: \$0.583
- WAV per mile: \$1.760
- WAV per minute: \$0.583
- Out-of-town per mile (non-WAV): \$1.576
- Out-of-town per mile (WAV): \$2.044
- Out-of-town per minute: \$0.675

Drivers can also visit the [Driver Pay Calculator](#) on TLC’s website to check how much they may be entitled to on a trip.

If you have questions about the new fare structure, please contact the TLC’s Driver Protection Unit, which investigates pay-related issues, by calling (718) 391-5539 or e-mailing [driverprotection@tlc.nyc.gov](mailto:driverprotection@tlc.nyc.gov).

Sincerely,

Taxi and Limousine Commission

###



Exhibit 3: An example of a palm card for passengers translated into Spanish.



<b>Refused by a taxi or app driver?</b>	<b>¿Rechazado por un taxista o un conductor que trabaja con una aplicación?</b>
 <p>Refused by a taxi or app driver, or see someone else refused service? We want to know.</p> <p>It's quick and easy, just use 311 via phone, online or app and provide the date, time, and location. If possible, provide the medallion or license plate number and driver information, and we will do the rest.</p>	 <p>¿Rechazado por un taxista o un conductor que trabaja con una aplicación, o ve que a alguien más se le ha negado el servicio? Queremos saberlo.</p> <p>Es rápido y fácil, solo marque el 311 por teléfono, en línea o a través de una aplicación y proporcione la fecha, hora y ubicación. Si es posible, proporcione el medallón o el número de la placa del vehículo y la información del conductor, y nosotros nos encargaremos del resto.</p>

Exhibit 4: Flyer describing Interpretation Services provided by Language Line Solutions, TLC's telephonic interpretation provider.



# Interpretation Services Available

**English Translation:** Point to your language. An interpreter will be called. The interpreter is provided at no cost to you.

<p><b>American Sign Language</b> <span style="float: right;">ᄒᆞᆫ</span> Point to your language. An interpreter will be called. The interpreter is provided at no cost to you.</p>	<p><b>Korean</b> <span style="float: right;">한국어</span> 귀하께서 사용하는 언어를 지정하시면 해당 언어 통역 서비스를 무료로 제공해 드립니다.</p>
<p><b>Arabic</b> <span style="float: right;">العربية</span> أشر إلى لغتك. وسيتم الاتصال بمترجم فوري. كما سيتم إحضار المترجم الفوري مجانًا.</p>	<p><b>Mandarin</b> <span style="float: right;">普通话</span> 请指定您的语言，以便为您提供免费的口译服务。</p>
<p><b>Bengali</b> <span style="float: right;">বাংলা</span> আপনার ভাষার দিকে নির্দেশ করুন। একজন দ্বোভাষীকে ডাকা হবে। দ্বোভাষী আপনি নিখরচায় পাবেন।</p>	<p><b>Nepali</b> <span style="float: right;">नेपाली</span> आफ्नो भाषातर्फ ओल्याउनुहोस्। एक दोभाषेलाई बोलाइनेछ। तपाईंको कुनै खर्च बिना, एकजना दोभाषे उपलब्ध गराइनेछ।</p>
<p><b>Burmese</b> <span style="float: right;">ဗမာစာ</span> သင့်ဘာသာစကားကိုညွှန်ပြပါ။ စကားပြန်ခေါ်ပေးပါမည်။ သင့်အတွက်စကားပြန်အခမဲ့ပေးပါမည်။</p>	<p><b>Polish</b> <span style="float: right;">Polski</span> Proszę wskazać swój język i wezwiemy tłumacza. Usługa ta zapewniana jest bezpłatnie.</p>
<p><b>Cantonese</b> <span style="float: right;">廣東話</span> 請指定您的語言，以便為您提供免費的口譯服務。</p>	<p><b>Portuguese</b> <span style="float: right;">Português</span> Indique o seu idioma. Um intérprete será chamado. A interpretação é fornecida sem qualquer custo para você.</p>
<p><b>Farsi</b> <span style="float: right;">فارسی</span> زبان مورد نظر خود را مشخص کنید. یک مترجم برای شما درخواست خواهد شد. مترجم بصورت رایگان در اختیار شما قرار می گیرد.</p>	<p><b>Punjabi</b> <span style="float: right;">ਪੰਜਾਬੀ</span> ਆਪਣੀ ਭਾਸ਼ਾ ਵੱਲ ਇਸ਼ਾਰਾ ਕਰੋ। ਜਿਸ ਮੁਤਾਬਕ ਇਕ ਦੁਭਾਸ਼ੀਆ ਬੁਲਾਇਆ ਜਾਵੇਗਾ। ਤੁਹਾਡੇ ਲਈ ਦੁਭਾਸ਼ੀਆ ਦਾ ਮੁਫਤ ਇੰਤਜਾਮ ਕੀਤਾ ਜਾਂਦਾ ਹੈ।</p>
<p><b>French</b> <span style="float: right;">Français</span> Indiquez votre langue et nous appellerons un interprète. Le service est gratuit.</p>	<p><b>Romanian</b> <span style="float: right;">Română</span> Indicați limba pe care o vorbiți. Vi se va face legătura cu un interpret care vă este asigurat gratuit.</p>
<p><b>Haitian Creole</b> <span style="float: right;">Kreyòl</span> Lonje dwèt ou sou lang ou pale a epi n ap rele yon entèprèt pou ou. Nou ba ou sèvis entèprèt la gratis.</p>	<p><b>Russian</b> <span style="float: right;">Русский</span> Укажите язык, на котором вы говорите. Вам вызовут переводчика. Услуги переводчика предоставляются бесплатно.</p>
<p><b>Hindi</b> <span style="float: right;">हिंदी</span> अपनी भाषा को इंगित करें। जिसके अनुसार आपके लिए दुभाषिया बुलाया जाएगा। आपके लिए दुभाषिया की निशुल्क व्यवस्था की जाती है।</p>	<p><b>Somali</b> <span style="float: right;">Af-Soomaali</span> Farta ku fiiqluqadaada... Waxa laguugu yeeri doonaa turjubaan. Turjubaanka wax lacagi kaaga bixi mayso.</p>
<p><b>Hmong</b> <span style="float: right;">Hmoob</span> Taw rau koj hom lus. Yuav hu rau ib tug neeg txhais lus. Yuav muaj neeg txhais lus yam uas koj tsis tau them dab tsi.</p>	<p><b>Spanish</b> <span style="float: right;">Español</span> Señale su idioma y llamaremos a un intérprete. El servicio es gratuito.</p>
<p><b>Italian</b> <span style="float: right;">Italiano</span> Indicare la propria lingua. Un interprete sarà chiamato. Il servizio è gratuito.</p>	<p><b>Tagalog</b> <span style="float: right;">Tagalog</span> Ituro po ang inyong wika. Isang tagasalin ang ipagkakaloob nang libre sa inyo.</p>
<p><b>Japanese</b> <span style="float: right;">日本語</span> あなたの話す言語を指してください。無料で通訳サービスを提供します。</p>	<p><b>Vietnamese</b> <span style="float: right;">Tiếng Việt</span> Hãy chỉ vào ngôn ngữ của quý vị. Một thông dịch viên sẽ được gọi đến, quý vị sẽ không phải trả tiền cho thông dịch viên.</p>


© 2019 LanguageLine Solutions

Language Solutions: Over-the-Phone, Video Remote, and Onsite Interpreting / Bilingual and Interpreter Staff Testing and Training / Translation and Localization

www.LanguageLine.com



Exhibit 5: Flyer describing how TLC employees can access Interpretation Services provided by Language Line Solutions, TLC’s telephonic interpretation provider.



## Quick Reference Guide

### NYC Taxi and Limousine Commission

#### HOW TO ACCESS AN INTERPRETER

1. DIAL: **866-874-3972**
2. PROVIDE: **Client ID**
3. INDICATE: the language you need
4. PROVIDE: ACCESS CODE

Code	Display	Code	Display
	Licensing - Client Services		S&E Hack Site
	Licensing - Call Center		S&E Medallion Renewal
	Licensing - Other Units		Training
	Policy Unit		Cashiers Unit
	Programs		Prosecution - Window
	Legal		Prosecution - Calls/Other
	USB Command Desk		Other

---

**IMPORTANT INFORMATION:**

**WORKING WITH AN INTERPRETER** - At the beginning of the call, interpreters identify themselves by name and ID number. Note this information for reference. Then tell the interpreter the nature of the call. Speak directly to the limited English proficient or Deaf or Hard of Hearing individual, not to the interpreter, pausing at the end of a complete thought. To ensure accuracy, your interpreter may ask for clarification or repetition.

**3-WAY CALL – INITIATING/RECEIVING A CALL** - Use the conference feature on your phone and follow the instructions provided to connect to an interpreter. If you are initiating the call, get the interpreter on the line first, then call the limited English proficient individual. If you are receiving a call, ask the caller to “Please Hold,” and then conference in the interpreter.

**PHONE INTERPRETING EQUIPMENT** - If you have interpreting equipment, use one handset to call into LanguageLine, once connected to the interpreter, give the second handset to the limited English proficient individual.

**CUSTOMER SERVICE** - To provide feedback, commend an interpreter, or report any service concerns, visit [www.LanguageLine.com](http://www.LanguageLine.com) and click on the “Client Resources” tab, scroll to “Voice of the Customer” and complete the form.

**LEARN MORE** Visit [www.LanguageLine.com](http://www.LanguageLine.com) or call 1-800-752-6096 for more information on our language access solutions.

© 2021 LanguageLine Solutions / [www.LanguageLine.com](http://www.LanguageLine.com)

