

Language Access Implementation Plan (2021)

I. Agency name and agency language access coordinator

New York City Taxi and Limousine Commission (NYC TLC)
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https://www1.nyc.gov/site/tlc/about/language_access.page

II. Agency mission and background

The Taxi and Limousine Commission (TLC) is committed to providing quality customer service to all TLC Licensees and members of the public, including those who have limited-English Proficiency (LEP). TLC Licensees represent the diversity of New York City, with Drivers born in dozens of countries and speaking more than 100 different languages.

III. Agency language access policy and goals

It is TLC's Language Access Policy to:

- Provide telephonic interpretation for all individuals served in person and via telephone
- Maintain multilingual signage advertising the availability of free interpretation at all our facilities
- Translate the most commonly distributed documents and communications containing essential licensing and passenger safety information into the top 10 City-mandated languages
- Consider language needs in all outreach efforts and provide language services at public events

IV. Agency language access accomplishments and progress on goals from previous LAIP 2018

Since 2018, the TLC has accomplished the following Language Access goals:

- Trained customer-facing staff in language access requirements and protocol
- Dedicated additional resources to provide simultaneous interpretation at Commission Hearings
- Established processes to translate all Licensee-wide email blasts into the top 10 languages
- Incorporated comprehensive language access provisions in the agency's continuity of operations plan (COOP)
- Included Language Access information on TLC's webpage
- Expanded translations of most commonly distributed documents to include Hindi and Punjabi, languages beyond the top 10 City-designated
- Distributed translated materials of our top outreach campaigns (Driver Pay, FHV Accessibility, and Service Refusal/Inclusion) at libraries, community organizations, elected official's offices, and industry stakeholder groups.

- Contracted a secondary document translation vendor to provide fast turnaround translations in cases of emergency

V. LEP population assessment

Factor 1: The number or proportion of LEP persons in the eligible service population

Drivers represent the largest category of TLC Licensees, with over 175,000 currently licensed by TLC. 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 represent the diversity of New York City. Professional drivers are born in dozens of countries and speak over 100 different languages. Over half of all drivers hail from five countries: Bangladesh, the Dominican Republic, Pakistan, the United States, and India. 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, Mandarin, and Formosan), Russian, Arabic, Urdu, French, Hindi, and Punjabi.

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, Woodside Inspection Facility, and Outreach Events. Additionally, staff interacts with the public over the phone and via email, social media, and web content.

While TLC has reduced the need for most Licensees to appear in person, certain transactions still needed to occur in-person. At the Customer Service Center, the Licensing Division served over 25,000 customers during CY 2020. At the Woodside Inspection Facility, TLC staff performed 95,857 vehicle inspections during CY 2020. Additionally, TLC's Licensing and Prosecution Divisions answered 192,153 calls during CY 2020.

The External Affairs Division sends informative emails to Licensees throughout the year. In 2020, External Affairs shared information on COVID testing, health updates, available resources, work opportunities (such as TLC Food Delivery), and agency updates. External Affairs staff personally speaks with hundreds of drivers, sharing information and answering questions. Additionally, staff shares information on our TLC website and social media, informing drivers in a wide variety of channels.

Factor 3: The importance of the benefit, service, information, or encounter to the limited English proficient person

Failure to provide language access services to the LEP population would negatively impact our licensees and the broad agency charge of furthering safe and reliable for-hire transportation in the City. By providing adequate language access services, we can help our Licensees to obtain and maintain a license with the TLC.

Factor 4: Available language access resources

TLC relies primarily on citywide 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 External Affairs and a Language Access Cabinet comprised of supervisors from each customer-facing TLC Unit or Division.

VI. Provision of language access services

Translation

TLC uses the services of Geneva Worldwide, Inc. to translate English documents and communications. Some examples of documents and communications translated into the top 10 City-designated languages include:

- Essential licensing guides, forms, applications, and checklists
- Licensee-wide email blasts about TLC rules and regulations
- Licensee-wide email blasts about TLC and partner agency events and resources
- Industry Notices explaining new TLC rules and policies
- Citywide distributed passenger informational materials (e.g., palm cards, videos, etc.) about TLC's Accessibility, Safety, and Inclusion initiatives.

TLC uses employees within the TLC, staff from TLC-Approved Driver Education, and staff from TLC 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 in the for-hire industry. To review high-profile documents and communications, such as our required Driver Education Exam, TLC has secondary contracts with consultants certified by the American Translators Association (ATA).

As of September 2020, the TLC also has a secondary document translation vendor, International Language Services Inc., for emergency translations that require faster turnaround.

Telephonic Interpretation

TLC currently uses the vendor Voiance Language Services, LLC. for telephonic interpretation. All TLC staff has access to telephonic interpretation services from any TLC telephone or TLC mobile device. Instructions on how to access telephonic interpretation services are available on the agency's intranet site. Additionally, frontline staff who most frequently access telephonic interpretation have been provided with phone labels to access a phone interpreter quickly.

In-person Interpretation

TLC currently uses Accurate Communication, Inc. for in-person interpretation. In addition to securing interpreters through the contracted vendor, TLC's multilingual outreach staff are frequently assigned to attend events based on their language skills and the anticipated language needs of the audience.

In 2020, the TLC saw the need to expand its interpretation services to virtual platforms. TLC has used the in-person interpretation vendor Accurate Communication, Inc. to fulfill this service. In 2021, TLC is seeking other interpretation solutions that can provide simultaneous virtual interpretation in multiple languages.

Language Access in Agency Communications

At all Commission Hearings and Meeting we provide interpretation services as needed for the public. We either provide consecutive or simultaneous interpretation depending on the need. All emails to licensees are translated in the top 10 languages and Hindi and Punjabi.

Plain Language

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 top 10 citywide designated languages and additional languages base on our licensee population.

Missing: Policies and Procedures

Policies and Procedures – the plan explains: The policies and procedures the agency has that explain, for example, how to identify and track an individual’s language, how to utilize the appropriate resource to provide language services, how to request that material be translated.

Multilingual Signage

TLC displays “Interpreting Services Available” signage in prominent locations at all its facilities. The signs and posters provide “Point to your language. An interpreter will be called.” instructions in 20 languages and state that interpretation is available at no cost. TLC’s Operations Unit frequently monitors the condition and placement of the signs to ensure compliance.

Languages beyond Top 10

TLC data shows that over half of all drivers hail from five countries: Bangladesh, the Dominican Republic, Pakistan, the United States, and India. While the TLC does not have exact data on the number of all LEP drivers, we will continue to devote resources to translate our essential documents into the top 10 languages plus Hindi and Punjabi, which are not included in the top 10 but are common in our population.

Emergency Preparedness and Response

TLC has a bank of language for emergency communications that have been translated into the top 10 City-mandated languages as well as Hindi and Punjabi. In those instances where emergency messages go beyond those of the current bank, the TLC utilizes expedited translation services through its contracted language services provider or submits expedited translation requests through the Mayor’s Office of Immigrant Affairs to quickly translate tailored emergency communications.

VII. Training

TLC’s Language Access Coordinator works with TLC’s Training Unit to ensure all frontline staff is trained on language access requirements and best practices. The training includes resources on how to identify an individual's primary language and how to utilize telephonic interpretation services. TLC's Training Unit also provides diversity awareness information to all TLC staff. All training formal trainings are tracked and all frontline new hires receive guidance from their supervisors on language access best practices.

VIII. Record keeping and evaluation

TLC tracks and evaluates language access goals through a combination of indicators. TLC maintains records of the agency's language services through monthly invoices and reports from our interpretation and translation vendors. Additionally, we have a Language Access Cabinet comprised of staff from across various TLC divisions. Staff on the Language Access Cabinet regularly communicate with the Language Access Coordinator to report on the quality of language access services and highlight areas where services should be improved, or additional agency support is needed.

IX. Resource analysis and planning

Each year, the Language Access Coordinator reviews Language Access metrics to determine the sufficiency of available resources to meet the current LEP population's needs and recommend any necessary resource allocation changes. The Language Access Cabinet monitors the Agency's language access services to identify gaps in services, offer solutions to close these gaps, and implement changes to improve the quality of language access services provided.

The TLC has the following task orders in place from September 2019 through July 2021

Service	Contracted Vendor	Task Order Amount
Document Translation	Geneva Worldwide, Inc.	\$260,878.50
Telephonic Interpretation	Voiance Language Services, LLC.	\$80,000.00
In-Person and Virtual Interpretation (Consecutive and Simultaneous)	Accurate Communication, Inc.	\$86,331.20

As of September 2020, the TLC also has a secondary document translation vendor, International Language Services Inc., for emergency translations that require faster turnaround.

X. Outreach and public awareness of language access services

TLC promotes public awareness of language access services through signage at all TLC facilities. TLC staff are also trained to identify LEP individuals' preferred language and offer language access services. Additionally, our External Affairs team provides TLC and other city agencies materials and resources in several languages to our licensees through a bi-monthly newsletter, emails, and phone calls. Before attending outreach events, the External Affairs team assesses the need for in-person interpretation. Through Driver intake forms, individuals' preferred languages are recorded and tracked.

TLC informs the public of the availability of free language services through:

- Multilingual signs and posters at all TLC facilities
- Translations on the agency’s website
- Email blasts to licensees specifying if language services will be provided at public events
- Mailing of translated materials to elected officials’ offices, partner city agencies, public libraries, and industry stakeholder groups

XI. Language Access complaints

The Language Access Coordinator monitors all language access complaints. Staff responsible for the intake and review of 311 complaints and written correspondence forward language access complaints to the Coordinator. The Language Access Coordinator also works with the Mayor's Office of Immigrant Affairs and 311 to ensure these complaints are received and addressed. The agency's number of language access complaints will be included in all annual language access assessments.

The public can submit language access complaints, questions, and requests to the agency via 311 or write to the Language Access Coordinator at tlcexternalaffairs@tlc.nyc.gov. Members of the Language Access Cabinet notify the Language Access Coordinator if their corresponding units receive any Language Access Complaints.

TLC’s language access webpage informs the public that they can submit language access complaints through 311 or email the Language Access Coordinator at tlcexternalaffairs@tlc.nyc.gov.

XII. Implementation plan logistics

Language access goal	Milestones	Responsible staff	Deadline
Provide most commonly distributed Licensing forms in the top 10 languages plus Hindi and Punjabi	Finalize translation of selected documents Post all documents on TLC’s website	Office of External Affairs Licensing Division Web Unit	April 2021
Provide translations on TLC’s online platforms TLC UP and LARS	Create How-To-Guides Conduct User Testing of guides with TLC internal and external stakeholders Translate and post guides online	Office of External Affairs Licensing Analytics Web Unit	April 2021
Expand Virtual Simultaneous Interpretation at Commission Hearings	Secure interpretation vendor with capacity for virtual interpretation in at	Office of External Affairs Operations Unit	Ongoing through 2021



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	least five languages simultaneously		
Develop agency-wide online Language Access Training	Adapt existing Language Access Training to an online platform	Training Unit Office of External Affairs	Summer 2022