

Language Access Plan

Introduction

A. Executive Order

On July 22, 2008 Mayor Bloomberg signed Executive Order 120, which outlined two primary responsibilities for New York City ("NYC" or the "City") agencies:

- 1. Designate a Language Access Coordinator within 45 days of the date of the Executive Order to oversee the creation and execution of an agency-specific internal language access policy and implementation plan
- 2. Develop such Language Access Policy and Implementation Plan by January 1, 2009

B. Background

- 1. New York City's unique customer base requires cultural competency and language access for its limited English proficient (LEP) customers. According to American Community Survey (ACS) U.S. Census data as prepared by the Population Division of the New York City Department of City Planning (DCP):
 - NYC is home to approximately 3.4 million immigrants
 - Almost half of NYC residents speak a language other than English at home
 - 1.8 million New Yorkers, or approximately ¼ of NYC's population, identify themselves as limited English proficient
 - The most common languages spoken and read by LEP individuals in NYC are:
 - 1. Spanish
 - 2. Chinese
 - 3. Russian
 - 4. Korean
 - 5. Italian
 - 6. Haitian Creole
- 2. There are two federal mandates that guarantee the provision of meaningful access to federally-funded services for LEP individuals:
 - a. Title VI of the 1964 Civil Rights Act:
 - Prohibits federally funded agencies and programs from discriminating against individuals based on race, religion, sex and national origin, also includes meaningful access to LEP customers
 - b. President's Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (August 11, 2000):
 - Instructs federal agencies to improve access to services by mandating that any federally conducted or assisted program or activities (i.e., recipients of federal funding) must provide meaningful access for LEP customers
- 3. Although these mandates cover many City social programs, Mayor Bloomberg signed the first local law regarding language access in 2003:
 - a. Local Law 73 (2003), Equal Access to Human Services Law:

Requires the NYC Human Resources Administration, Department of Homeless Services, Administration for Children Services, and Department of Health and Mental Hygiene to provide specific language access services and collect data on the LEP populations that they serve.

C. Role of the Mayor's Office

The Mayor's Office will be available to support City agencies as they create their own language access polices and plans:

- 1. Working with Language Access Coordinators in creating policies and plans
- 2. Sharing examples of functioning Language Access Plans
- 3. Distributing leading practices for language access planning
- 4. Providing technical support as questions arise
- 5. Reviewing language access plans for compliance with Executive Order 120
- 6. Creating citywide tools/solutions for providing language access

D. DOT's Language Access Coordinator

The New York City's Department of Transportation ("DOT" or the "Department") Language Access Coordinator should be a current employee of the Department who:

- 1. Acts as DOT's Customer Service Liaison or works closely with the Customer Service Liaison
- 2. Has familiarity with customer based divisions of DOT
- 3. Has decision-making authority
- 4. Dedicates time to creating DOT's Language Access Plan and monitors its implementation
- 5. Oversees the collection of data on current customer base as needed
- 6. Provides assessment and analysis of current programs
- 7. Provides support to Borough and DOT Unit leadership on language access services
- 8. Develops reporting tools and/or systems to capture data
- 9. Oversees the development and distributions of materials to inform DOT staff and customers of language access programs, policies and procedures
- 10. Liaises with the Mayor's Office regarding DOT's Language Access Plan and implementation strategy
- 11. Creates a year-end summary report of DOT's progress and compliance with Executive Order 120

I. Agency Mission and Services

A. Mission of the Agency

DOT's mission is to provide for the safe, efficient, and environmentally responsible movement of people and goods in the City of New York and to maintain and enhance the transportation infrastructure crucial to the economic vitality and quality of life of our primary customers, City residents. Our agency's work is guided by <u>Sustainable Streets</u>, the <u>Strategic Plan for the New York City Department of Transportation 2008 and Beyond</u>. We are customer-driven in all our activities. We seek opportunities to create partnerships in the provision of transportation services through appropriate relationships and alliances. To accomplish our mission, the Department works to achieve the following goals:

- Provide safe, efficient, and environmentally responsible movement of pedestrians, goods, and vehicular traffic on the streets, highways, bridges, and waterways of the City's transportation network;
- Improve traffic mobility and reduce congestion throughout the City;
- Rehabilitate and maintain the City's infrastructure, including bridges, tunnels, streets, sidewalks, and highways;
- Encourage the use of mass transit and sustainable modes of transportation; and
- Conduct traffic safety educational programs.

B. Direct Services Offered

DOT has a staff of over 4,000 that oversees one of the most complex urban transportation networks in the world. Our staff manages approximately 5,800 miles of streets, sidewalks, and highways and 789 bridge structures, including six tunnels. DOT staff installs and maintains over 1.3 million street signs, traffic signals at more than 11,900 signalized intersections, over 300,000 streetlights, 69 million linear feet of markings, and approximately 63,000 parking meters. DOT promotes the use of sustainable modes of transportation. We design bicycle facilities, bus lanes, and public plazas. We operate the Staten Island Ferry, which serves over 19 million people annually, oversee ferry operations on City-owned piers, and administer a citywide program advancing the use of alternative fuels. We educate students and adults Citywide about street safety. Our staff issues parking permits to people with disabilities, not-for-profit agencies and governmental entities, and commercial vehicle permits for trucks; issues construction permits for work in City streets; and manages the City's Adopt-a-Highway program.

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¹ Available for download at DOT's website: www.nyc.gov/dot

II. Agency's Language Access Goals

A. Goal of Agency's Language Access Plan

DOT's goal is to provide meaningful access for DOT's LEP customers to DOT services and materials by developing and implementing an agency-specific language assistance plan to improve the accessibility of DOT services to eligible LEP customers.

B. Gauging Success

To know whether DOT has successfully implemented its Language Access Plan:

- 1. DOT's Customer Service Group will collect data on our interactions with LEP customers
- 2. DOT's Language Access Coordinator will:
 - a. Oversee the collection of data on current customer base as needed
 - b. Provide assessment and analysis of current programs
 - c. Develop reporting tools and/or systems to capture data
 - d. Oversees the development and distributions of materials to inform staff and customers of language access programs, policies and procedures
 - e. Create a year-end summary report of progress and compliance with Executive Order 120.

III. LEP Population Assessment

- A. Utilizing the Top Six Citywide LEP Languages
- 1. The Department will utilize the top six citywide LEP languages in our implementation plan based on ACS U.S. Census data as prepared by the Population Division of DCP (hereinafter "Census data"), combined with institutional knowledge and ongoing community outreach.
- 2. For the Staten Island Ferry, the Department will utilize the languages identified as part of the Federal Transit Administration's ("FTA") 2008 Triennial Review to comply with FTA regulations as explained below.
- 3. If DOT determines that services will be provided to a group that primarily speaks another language not included as part of the top six citywide LEP languages, DOT will make adjustments where practicable and necessary.
- B. Execution of the Department of Justice's Four-Factor Analysis
- As set forth in Executive Order 120, an agency's Language Access Plan shall be developed by undertaking the four-factor analysis, which is based on Presidential Executive Order 13166 (August 11, 2000) and policy guidance issued by the U.S. Department of Justice effective June 12, 2002 (hereinafter "DOJ Guidance").²
- 2. According to DOJ Guidance, what constitutes reasonable steps to ensure meaningful access will be contingent on the four factors below.

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² 67 FR 41455

Factor 1	The number or proportion of LEP persons in the eligible service population
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- 1. DOT provides direct public services citywide. Therefore, DOT utilized, and will continue to utilize, available Census data, combined with institutional knowledge and ongoing community outreach to determine the number or proportion of LEP persons in the eligible service population and the breadth and scope of language services that are needed.
- 2. As stated above, NYC, DOT's customer base, has:
 - a. Approximately 3.4 million immigrants
 - b. Almost half of its population speaking a language other than English at home
 - c. Approximately one quarter of its population, 1.8 million New Yorkers, identifying themselves as LEP.
- 3. The percentage breakdown of the most common languages spoken and read by the approximately 1.8 million LEP individuals in the City is:

Language	Percent
Spanish	50.8
Chinese	14.3
Russian	6.8
Korean	3.0
Italian	2.3
Haitian Creole	2.1

4. For the Staten Island Ferry, which must comply with FTA regulations and, therefore, Title VI of the Civil Rights Act of 1964, DOT has additional information as DOT performed a Title VI Update on May 9, 2008 as part of the FTA's Triennial review. Pursuant to this Update, which contained a separate demographic analysis based on census and internal information, DOT determined that the top four languages in which to translate Title VI related postings on the vessels and in the Ferry terminals were Spanish, Chinese, Korean and Russian. DOT will continue to focus on providing meaningful access opportunities to ferry riders in those languages.

Factor 2	The frequency with which LEP individuals come into contact with the
Tactor 2	agency

 DOT's direct public services can be further divided into two categories: (1) daily services; and (2) periodic services. Daily services are consistent, day-to-day services such as those provided by our permit offices. Periodic services are DOT's periodic outreach efforts which focus on specific populations or neighborhoods, such as street safety educational programs for students and/or adults.

- 2. For daily services, the Department will determine the proportion of LEP persons in the eligible service area based on U.S. Census data, other internal data, such as available data on DOT customers and data obtained from 311.
 - a. 311, New York City's phone number for government information and non-emergency services, provides translation services in over 120 languages to any caller. Most DOT requests are processed by 311 and, consequently, most DOT service requests can be made in any language. However, a small number of calls are transferred directly to DOT divisions. The following table shows DOT's available data on calls requiring language assistance from 2004 to 2008³:

Dot Unit	Inquiry Name	# of Inquiries from CY 2004 to CY 2008	# of Language Line Calls
(Grand Total	67,403	220
	Parking Permit - City Employee	1,480	1
Authorized Parking Permits	Truck Permit - Restricted Use Roads	2,428	12
Authorized Farking Fermits	Parking Permit - Non-Profit Organization	1,792	1
	Parking Space Request	2,383	10
Authorized Parking Permits Total		8,083	24
Banner Unit	Sidewalk Banner Permit	592	4
Banner Onit	Street Banner Permit	287	0
Ban	Banner Unit Total		4
	Bridge Opening for Boat Traffic	218	0
Pridges	Maritime Navigation Lights Complaint	23	0
Bridges	Truck Permit - Oversize Trucks	10,018	21
	Truck Permit - Special Hauling	253	1
В	ridges Total	10,512	22
Customer Service - 311 Information Line	Call for DOT Commissioner	6,744	11
Customer Service - 311 Information Line Total		6,744	11
Franchises, Concessions and	Large Planter Installation Application	319	1
Consents	Revocable Consents	239	1

³ Language Line is the vendor with which the NYC Department of Information Technology and Telecommunications (DoITT) entered into a citywide contract to provide translation and interpretation services.

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Franchises, Concessions and Consents Total		558	2
Office of Freight Mobility Truck Route Study		1,072	4
Office of Freight Mobility Total		1,072	4
	Dumpster Permit - Bronx	475	0
	Sidewalk Construction Permit - Bronx	1,071	5
	Street Opening Permit - Bronx	95	0
	Dumpster Permit - Brooklyn	1,249	8
	Sidewalk Construction Permit - Brooklyn	2,293	11
	Street Opening Permit - Brooklyn	274	0
	Dumpster Permit - Manhattan	10,033	33
Permit Management	Sidewalk Construction Permit - Manhattan	16,304	55
	Street Opening Permit - Manhattan	1,463	1
	Dumpster Permit - Queens	1,106	1
	Sidewalk Construction Permit - Queens	2,581	27
	Street Opening Permit - Queens	270	2
	Dumpster Permit - Staten Island	214	0
	Sidewalk Construction Permit - Staten Island	763	0
	Street Opening Permit - Staten Island	109	0
Permit I	Permit Management Total		143
Roadway Repair & Maintenance	Adopt-A-Highway Information	362	1
Roadway Rep	air & Maintenance Total	362	1
Staten Island Borough Commissioner	Right Turn on Red Request - Staten Island	71	0
Staten Island Bo	rough Commissioner Total	71	0
Traffic Safety Education	Safety Education - DWI Community Service	239	2
	Safety Education - Request Materials or Speaker	292	1
	Safety Education - Seniors and Disabled	27	0
	Safety Education for Schoolchildren - Manhattan	74	4
	Safety Education for Schoolchildren - Bronx	55	0
	Safety Education for Schoolchildren - Brooklyn	68	1

Traffic Safety Education Total		822	9
	Safety Education for Schoolchildren - Staten Island	14	0
	Safety Education for Schoolchildren - Queens	53	1

3. The breakdown, by language requested, of calls to 311 pertaining to DOT during the same period as the table above is as follows:

Language Name	Language Line Calls CY 2004 to CY 2008	Language Line Calls CY 2008	Language Line Calls CY 2007
Cantonese	49	24	9
French	1	0	1
Greek	1	0	1
Italian	2	0	0
Korean	8	3	0
Mandarin	58	25	23
Other	10	0	2
Polish	1	0	0
Russian	9	2	4
Spanish	23	5	4
Unspecified	58	17	17
Grand Total	220	76	61

- 4. The Department will continue to monitor 311 data and Language Line's billings pertaining to languages required, the nature of the transactions and the duration of each transaction for reporting purposes.
- 5. The Department conducted an initial poll of DOT's Borough Offices and determined that for daily services, there is not an extant demand for language services at the Borough Office level. This is mainly because the majority of DOT customers seeking DOT's daily services are expediters, who file documents with DOT on behalf of clients for a fee, and thus are not typically LEP customers. DOT, however, will continue to monitor demand for language services at the Borough Offices and further efforts will be made to determine if there is a latent demand.

6. For periodic services, DOT will use available Census data, DCP community data, combined with institutional knowledge and ongoing community outreach, to take reasonable steps to provide meaningful opportunities for language access.

Factor 3	The importance of the benefit, service, information, or encounter to the
ractor 5	LEP person

- 1. The Department recognizes that within the range of services it provides some services are prioritized. Activities such as outreach, issuance of violations, legal actions, safety tips, work notices and the like are of highest priority. Information about and an understanding of these activities should be effectively communicated to all persons immediately affected.
- 2. Other activities and materials such as technical forms and optional meetings are of lesser importance and hence a lower priority.

Factor 4	The resources available to the agency and the costs of providing
ractor 4	language services

- 1. The Department will implement interpretation and translation services based on the evaluation of pertinent data collected.
- 2. For translation and interpretation services, DOT will utilize DoITT's citywide contract for Language Line.
- 3. According to a Task Order submitted to DoITT, DOT estimates that the usage of language services for the next three years will be as follows:

Service	Estimated Use
Telephone Interpretation	280 minutes/month
Translation	18,966 words ⁴

IV. Implementation Plan Logistics

A. Existing Access Opportunities

DOT has already undertaken several efforts to provide services to DOT's LEP customers.

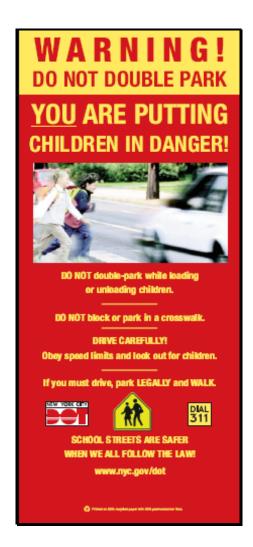
1. For periodic services and documents related to these services, the Department already utilizes Census and DCP data to determine language access needs.

⁴ This is the estimated word count for the one time translation of 18 DOT Forms into the top six LEP languages.

- 2. These are some examples which highlight DOT's commitment to provide safety and regulatory materials to DOT's LEP customers:
 - a. When a new bicycle lane was installed on Grand Street in Manhattan, an information brochure detailing the changes was created. Based on DCP data, the Department recognized the high proportion of Chinese and Spanish speaking residents in the neighborhood. Utilizing an existing translation contract, the brochure was translated into both languages to be printed and distributed in the community:



- b. DOT's helmet distribution initiative. Local law requires that all commercial cyclists wear helmets. Recognizing that many of the City's delivery workers have limited English proficiency, DOT initially partnered with the Chinese Consolidated Benevolent Association and Chinese Chamber of Commerce to sponsor a helmet fitting and giveaway event for delivery workers in Chinatown. In addition to translators on site, DOT provided a helmet waiver form and summary of bicycle rules and regulations in Chinese. Over 1,000 helmets were distributed.
- c. As part of the "Safe Streets for Seniors" outreach program, LEP needs were assessed and presentations and Q&A were provided with real time translations. Translated materials were also provided.
- d. As part of the "Zero Tolerance" outreach program done in conjunction with the NYPD, DOT Borough Commissioners distributed brochures such as this one warning of the dangers of double parking while loading or unloading children:





e. SI Ferry Postings. To comply with FTA regulations, postings on the vessels and Ferry terminals notify ferry riders of their Title VI rights and the process for filing a complaint:

Filing a Title VI complaint

DOT is committed to ensuring that no person is excluded from participation in, or denied the benefits of, or be subject to discrimination in the receipt of its services on the basis of race, color or national origin as protected by Title VI of the Civil Rights Act of 1964, as amended ("Title VI"). If you believe you have been subjected to discrimination under Title VI, you may address a written complaint during regular business hours to: Director of Passenger Services, New York City Department of Transportation, Staten Island Ferries Division, 1 Ferry Terminal Drive, Staten Island, New York 10301. At other times, individuals should dial 311.

Cómo presentar una querella de Título VI

DOT tiene el compromiso de asegurar que ninguna persona sea excluida de participar, o que se le nieguen beneficios, o que sea. objeto de discriminación debido a su raza, color u origen nacional al recibir servicios, bajo la protección del Título VI de la Ley de Derechos Civiles de 1964, tal como fue enmendado ("Title VI"). Si usted cree que ha sido obieto de discriminación bajo el Título VI, puede presentar una querella por escrito, y durante las horas de oficina, a DOT, Director of Passenger Services, New York City Department of Transportation, Staten Island Ferry Division, 1 Ferry Terminal Drive, Staten Island, New York 10301. En cualquier otro momento, las personas deben marcar 311.



Подача жалобы согласно Разделу VI:

Департамент транспорта (DOT) стремится к тому, чтобы никому не было отказано в получении услуги льгот и чтобы никто не был подвергнут дискриминации по признаку расы, цвета кожи или этнического происхождения, что предусмотрено Разделом VI Закона о гражданских правах 1964 г. с изменениями и дополнениями ("Раздел VI"). Если Вы считаете, что подверглись дискриминации на основаниях, указанных в Разделе VI, Вы можете обратиться с письменной жалобой в рабочие часы к Директору пассажирских услуг (Director of Passenger Services) Департамента транспорта г. Нью-Йорка по адресу: Department of Transportation, Staten Island Ferry Division, 1 Ferry Terminal Drive, Staten Island, New York 10301. В нерабочие часы звоните по телефону 311.



根據民權法案第六條提出申訴:

紐約市運輸局承諾,所有人在接受服務時, 都應受到 1964 年民權法案第六條 (Title VI of the Civil Rights Act of 1964) 修訂版之保護,絕不容許服務人員因任何人 之種族、膚色或國籍而拒絕提供服務或權益 或加以歧視。若您認為自己在第六條規定下 受到歧視,您可在平常上班時間向紐約市運 輸局 (New York City Department of Transportation) 的乘客服務主任 (Director of Passenger Services) 提出中訴, 地址是: Staten Island Ferry Division, 1 Ferry Terminal Drive, Staten Island, New York 10301. 其他時間、清撥 311 尋求協助。



법령 제6장에 의거한 불평신고

개정 민권법(Civil Rights Act of 1964) 제 6장 (*타이를 VI)의 보호에 의거하여, DOT의 서비스를 제공받는 데 있어 그 누구도 인종. 피부색깔 또는 출신국가로 인해 참여가 배제되거나 해택이 거부되거나 차별을 받지 역제되기다 메릭이 기구되기다 자글을 받으 못하도록 보장하고 있습니다. 만일 귀하가 범령 제 6장에 의거해 차별을 받았다고 생각되시면, 1 Ferry Terminal Drive, Staten Island, New York 10301의 주소지에 위치한 뉴욕시 교통국 스테톤 아일랜드 페리 부서의 승객업무 부장(Director of Passenger Services, New York City Department of Transportation, Staten Island Ferry Division) 앞으로 서면 불평신고를 정규 근무 시간 중 제출하실 수 있습니다. 이외의 시간에는 311번으로 전화하실 수 있습니다.



Please visit our website at: www.nyc.gov/dot, or Dial 311

B. Timeline/Major milestones

DOT will implement additional elements to complete our plan in phases:

Outreach Interpretation Services (Volunteer Language Bank)	November 2008
Periodic Services Document Translation	November 2008
Creation of a Language Access Plan	January 1, 2009
Telephone Interpretation Services	May 2009
Outreach Interpretation Services (Non-Volunteer)	May 2009
Daily Services Document Translation	May 2009-2012
Translation of signage at public service centers	October 2009
Training of employees in public contact positions	May 2009 & ongoing

- C. Responsibility for Implementing the Language Access Plan
- 1. The responsibility for implementing and carrying out Executive Order 120 to ensure meaningful access for DOT's LEP customers is shared by the Department as a whole.
- 2. The language access program will be overseen by the Language Access Coordinator who will serve as the primary point of contact for implementing the plan as well as the point of contact for Mayoral level compliance reviews.

V. Service Provision Plan

- A. Interpretation Services
- As stated above, DOT will provide interpretation services over the phone and at public service centers through the DoITT citywide contract for Language Line. Interpretation services will be available in the top six LEP Languages, and all other Languages supported by Language Line.
 - a. For public service centers, DOT is exploring the possibility of installing dual handset phones for the use of interpretation services.
 - b. For Staten Island Ferry riders, DOT is exploring the possibility of adding Language Line equipment to the "talking kiosks" in either or both Staten Island Ferry Terminals for the use of interpretation services.
 - c. DOT will not require a family member or friend to be used as an interpreter unless the applicant/customer requests such assistance from their family member or friend.
 - d. DOT will post signs and utilize other materials developed by the Mayor's Office to inform our customers of the availability of free-of-charge interpretation services.

2. Identifying the Primary language of DOT customers

- a. DOT staff, both over the phone and at service centers, should ascertain as soon as practical whether a customer is an LEP customer and, if so, the primary language spoken by that customer.
- b. It is recognized that evaluating the ability of the customer to communicate effectively is essential in providing good service.
- c. If an LEP customer is unable to identify its primary language spoken, we will call Language Line and request an interpreter.
- d. Language Line's staff will assist in identifying the customer's language.
- e. DOT staff will also use any materials developed by the Mayor's Office to aid in identifying an LEP customer's primary language such as a language identification posters and "I Speak" cards.



B. Translation of Written Materials

For the translation of written DOT materials into the top six citywide LEP Languages as required, DOT will utilize the DoITT citywide contract for Language Line.

1. Essential Documents

Based on DOJ Guidance after applying the four-factor analysis an agency may determine that the translation of vital written materials into the language of each frequently-encountered LEP group eligible to be served and/or likely affected by the recipient's program is necessary. Such written materials to be translated could include:

- a. Consent and complaint forms
- b. Intake forms with the potential for important consequences
- c. Written notices of rights, denial, loss, or decreases in benefits or services, parole, and other hearings
- d. Notices of disciplinary action
- e. Notices advising LEP persons of free language assistance
- f. Written tests that measure competency for a license, job, or skill for which knowledge of English is not required that does not require knowledge of English
- g. Applications to participate in a program or activity or to receive benefits or services

- 2. The extent of an agency's obligation to provide written translations of documents should be determined by the agency on a case-by-case basis, looking at the totality of the circumstances in light of the four factor analysis.
- 3. DOT has determined that the following documents meet the criteria established by the U.S. Department of Justice:
 - 1. Alternate Side Parking Calendar
 - 2. Bicycle Rules and Regulations Brochure⁵
 - 3. City Racks Application
 - 4. City Racks Repair Request Form
 - 5. DOT FOIL request Form
 - 6. Municipal Parking Field Permit Application
 - 7. Parking Card Application
 - 8. Sidewalks Brochure
 - 9. Parking Permit Clergy Application
 - 10. Parking Permit for People with Disabilities ("PPPD") -City application
 - 11. PPPD -State application
 - 12. PPPD-Lost or Stolen
 - 13. PPPD-Never Received
 - 14. PPPD-Permanent Vehicle Change Application
 - 15. PPPD-Renewal
 - 16. Staten Island Ferry Schedule
 - 17. Truck Rules and Regulations Guide
 - 18. Street (Holiday) Lighting application
 - a. Pursuant to a Task Order submitted to DoITT, DOT has requested translation of these essential documents into the top six LEP languages.
 - b. Hard Copies of the above translated documents will be made available upon request or via DOT's website (see below).
- 4. DOT will incorporate plain language guidelines and standards⁶ into all translated materials so that documents are easy-to-read.

C. DOT's website

The Mayor's Office, in conjunction with DoITT, is developing an online language access policy pertaining to websites which the Department intends to follow where practicable. A copy of DOT's Language Access Plan and all translated DOT essential documents will be posted online.

⁵ DOT's Bicycle Rules and Regulations Brochure has already been translated into Chinese and Spanish.

⁶ A copy of "Easy-to-Read NYC: Guidelines for Clear and Effective Communication" is available at www.nyc.gov/easytoread

D. Signage at Public Service Centers

Mayor's Office signage will be posted in all DOT public service centers, including the permit offices in each Borough, to notify DOT customers of the availability of free-of-charge interpretation services. DOT will also post directional signage where feasible.



E. Outreach

To notify DOT's customers about the services we are offering for DOT's LEP customers, as stated above, DOT will post signs in all public service centers, and will post DOT's Language Access Plans and all translated essential documents in our website. DOT will also explore other ways to reach DOT's LEP customers through DOT's Communications Office.

VI. Training

DOT's effective commitment to Executive Order 120 requires a trained and knowledgeable staff. DOT intends to implement the following training guidelines:

- 1. DOT'S Language Access Coordinator will provide a one-time orientation on DOT's language access programs, policies and procedures to all current DOT employees in public contact positions. This orientation will include training on how to identify a customer's primary language. DOT's Language Access Plan will be provided at the orientation and will also be posted on DOT's website. Training is expected to start by May 2009.
- 2. Information on DOT's language access policies and procedures will also be transmitted to new DOT employees in public contact positions as part of their new hire orientation. Such new employees will also receive a copy of DOT's Language Access Plan.
- 3. DOT's Language Access Coordinator will make managerial and supervisory staff, even if they do not interact regularly with LEP persons, fully aware of DOT's Language Access Plan in order to reinforce its importance and ensure its implementation by staff.
- 4. DOT's Language Access Coordinator will oversee the development of the necessary internal documents and materials to inform staff of DOT's language access programs, policies and procedures.
- 5. Language Line will conduct training sessions for DOT employees who will be using their service and equipment, and also provide tools and documents to guide employees.
- 6. Cultural sensitivity training will be provided as part of mandatory customer service training developed by the Mayor's Office Customer Service Group and administered through DCAS.

VII. Record Keeping and Evaluation

To evaluate the quality of our language access services, maintain records of such services and to promote compliance with Executive Order 120 the Department will:

- 1. Maintain records pertaining to the requests for services in non-English languages.
- 2. Track feedback from LEP clients and from staff.
- 3. Create a year-end summary report of progress and compliance with Executive Order 120.
- 4. Utilize Language Line's guidance on how to ensure quality in interpretation and translation. According to Language Line, every completed transaction is quality checked by a proof reader or editor before delivery to the customer.
- 5. Via the Language Access Coordinator review DOT's Language Access Plan periodically for the following:
 - a. Changes in the frequency of encounters with LEP language groups
 - b. Changes in resources including new technologies, additional resources, and budget availability
 - c. Effectiveness of existing language assistance to LEP persons

- d. Whether identified sources for assistance are still available
- e. Need to contract for additional interpreter services

VIII. Resource Analysis and Planning

Based on the analysis of DOT's institutional knowledge combined with ongoing community outreach, 311 data, and DOT's current resources, to implement the Department's Language Access Plan, the Department will:

- 1. Utilize the citywide contract between DoITT and Language Line Services, Inc. to provide training, foreign language interpretation and translation services.
- 2. Utilize the Department's existing volunteer language bank, when possible, to verify translation services and serve as real time translators for walk-in customers and at presentations. DOT will work to rely less on the volunteer language bank and more on regular contract services.
- 3. Utilize the Mayor's Office of Operations and the Mayor's Office of Immigrant Affairs to obtain assistance pertaining to the development and execution of the Department's Language Access Plan.
- 4. Utilize any signage or other materials currently being developed by the Customer Service Group of the Mayor's Office of Operations to provide meaningful access opportunities.