

## **I. Agency Mission and Background**

### **Mission**

The NYC Taxi & Limousine Commission (TLC) licenses and regulates approximately 60,000 for-hire vehicle and taxi vehicles, 100,000 drivers, related business owners and agents. Its goal is to ensure safe, quality service to the public through the development of rules and regulations.

### **Direct Services**

TLC licenses applicants, ensures their compliance with our standards, enforces our rules and adjudicates cases against licensees. There are a number of offices that play a role in this process.

- Licensing: New and current drivers receive their licenses from Licensing. They also file any necessary paperwork with this division.
- Adjudications (TLC Court): Violations of our rules are heard in our administrative courts.
- Uniformed Services Bureau: This unit is comprised of the Safety & Emissions Division and Enforcement. Safety & Emissions officers inspect all yellow taxis (13,237 in total) three times a year. The inspection site is a certified NY State Department of Motor Vehicles facility, which allows drivers to avoid additional inspections at a separate DMV facility. Enforcement ensures that our licensees follow the rules of the TLC and the laws of the City of New York.
- Administrative Services: This unit is comprised of all support staff, including TLC's Call Center, which serves licensees and members of the public.

## **II. Agency Language Access Goals**

### **Goal of TLC's Language Access Plan:**

- To ensure that our licensees, and the general public, receive the same level of customer service.
- To ensure that our licensees understand and comprehend the rules and expectations placed upon them.
- To ensure the safety of the general public by making our communication with industry, passengers, and drivers clear and effective.
- To review our language access plan on an annual basis to ensure it responds to the goals stated above.

### **Summary of past initiatives to improve language access for our customers**

Over the past two years, the TLC has implemented several initiatives to improve the customer service for our LEP and non-English speaking customers.

### **Interpretation Services**

- Licensing created the office of Licensee Support/Customer Service. This office focuses on improving the customer service licensees receive.

- It created the customer service unit, which interacts with licensees while they wait to be serviced. Staff within this unit must be bilingual.
- These staff members speak Spanish, Chinese, and English.
- This unit has improved the intake rate of licensees.
  - Intake is having all necessary forms completed on the first visit to Licensing.
  - The current intake rate is 95%.
- Call Center employees can handle calls from Spanish-only speakers.
- In TLC Courts, licensees can request an adjournment of their hearing if they do not understand English. However, yellow taxi drivers cannot request this type of adjournment because they are required to know English.

#### Translation Services

- In Licensing, signage for licensing forms is in English and Spanish.
  - However, none of the actual licensing forms are translated from English.
- In TLC Courts, signage at our Long Island City court is in English and Spanish.
  - Adjudication forms that are sent to licensees are not translated from English.

#### Plain Language

The primary form of communication with our licensees is through written forms. This makes the use of plain language a top priority for the TLC.

- In Licensing, Customer service staff have been trained in plain language writing.
  - They have rewritten the forms that are distributed to first time applicants and renewals, which has increased TLC's rate of application intakes.
  - Signage has been rewritten into plain language.
- In TLC Courts, All current TLC administrative law judges have been trained in plain language.
  - Future judges will have this as part of their initial training.
- In TLC's Administrative offices, most senior staff have been trained on plain language writing.
- The TLC has contracted a consultant to help rewrite its entire rule set into plain language.
  - This process is in its second year.

### **III. LEP Population Assessment**

#### Current Assessment:

Based on staff interactions with licensees at our Licensing facility in Long Island City and internal research done by our customer service unit, four of the top six citywide LEP languages are spoken by licensees:

- Spanish
- Chinese
- Russian
- Haitian Creole

Licensees also use languages outside of the top six citywide LEP languages such as:

- Urdu
- Hindi

This assessment is highlighted by a recent survey of licensees' language assistance request from November 21<sup>st</sup> through December 12<sup>th</sup>, 2008. In that period:

- 200 request were placed
- 172 were for Spanish-only speakers
- 20 were for Chinese-only speakers (Mandarin & Cantonese)

#### Future Assessment:

In order to ensure that we continue to provide the best customer service possible to our licensees, the TLC will add a question to its applicant form: "what is your primary language?" The purpose of adding this question is to have on-file the language that each licensee uses. Furthermore, the Customer Service Unit at our Licensing Division will distribute "I Speak" cards to facilitate interpretation services. This two-pronged approach will give us a better understanding of the language needs of our licensees. TLC will continue to utilize staff that speak different languages as licensee interpretation needs evolve. The agency will continue to rely on Language Line services for interpretation needs that staff cannot meet.

### **IV. Implementation Plan Logistics**

#### Timeline as of January 1, 2009

**January, 2009:** The TLC will have its contract setup with Language Line, which will provide over-the-phone interpretation services at our call center, in our courts, and at our licensing division. Agency staff will be trained as soon as our contract is activated.

**September 2009:** Our rules revision project will have all of our rules rewritten into plain language and passed by the Commission.

**2009-2010:** As noted earlier, the TLC has implemented several plain language and language interpretation/translation services over the past two years. However, these initiatives will continue to be assessed and improved in order to ensure the best possible customer service for our licensees:

- Plain language training for staff will continue to be a priority for our agency.
  - Our legal staff will be trained in plain language writing. (End of 2<sup>nd</sup> Quarter of 2009)
- We are also committed to regularly updating our forms and facility signage to better adhere to the needs of our LEP and non-English speaking customers. (Will be done continuously on a semi-annual basis)
- Implementing customer service training on the use of Language Line and the appropriate steps for assisting LEP and non-English speaking customers for our frontline staff. (End of 2<sup>nd</sup> Quarter of 2009)

- Creating a Volunteer Language Bank. (End of 2009)
- Using “I speak...” cards and language identification sheets. (End of 1<sup>st</sup> Quarter of 2009)

**February 2009:** Our new license/renewal application form will have a question added to it that will ask applicants to identify their primary language.

**February-June 2009:** A significant sample of licensees will have answered this question by this period.

### Milestones

The TLC has reached many milestones over the past two years with its language access initiatives.

Most have been mentioned earlier in this document, but to highlight the main ones:

- Creating a multilingual customer service unit within our Licensing division that interacts with licensees while they wait to be serviced to ensure that their paperwork is correctly filled out.
- Rewriting our signage at our licensing and adjudication facilities into plain language and translating them into Spanish.
- Redesigning and rewriting our forms in order to make them clearer and understandable to our licensees.
  - We surveyed licensees to see if they found the new forms more useful than the older ones.
- Training senior staff, all administrative law judges, and customer service staff on plain language.
- Beginning the process of revising and rewriting our rules into plain language.

The following include major milestones we plan on reaching in the near future:

- Establishing a contract with Language Line for over-the-phone interpretation services. (Completed on January 1<sup>st</sup>, 2009)
  - Using this contract to have interpretation services during our over-the-phone court hearings. (March 2009)
- Implementing a customer service training course for all front line staff that incorporates ways of assisting LEP and non-English speaking customers (End of 2<sup>nd</sup> Quarter of 2009).
  - Current customer service training does not include this type of training.
- Completing the revision and rewrite of TLC rules into plain language. (3<sup>rd</sup> Quarter of 2009)
- Redesigning and rewriting signage in all facilities. (End of 2009)
- Training legal staff in plain language writing. (End of 2<sup>nd</sup> Quarter 2009)
- Creating a Volunteer Language Bank. (End of 2009)
- Using “I speak” and language identification sheets in all of our facilities. (End of 1<sup>st</sup> Quarter of 2009)

## Personnel

The TLC's language access plan will be implemented by several offices:

- Assistant Commissioner for Constituent Affairs/TLC Language Access Coordinator: Oversees the TLC's plain language and language access initiatives. Coordinates all efforts within the agency that deal with interpretation and translation services.
- Chief of Staff to the First Deputy Commissioner: Oversees the revising and rewriting of our rules into plain language.
- Deputy Chief Administrative Law Judge: Oversees the training of administrative law judges in plain language writing.
- Director of Licensee Support/Customer Services: Oversaw the rewriting of our forms into plain language and the redesign of our signage into Spanish. Oversees the Customer Service Unit in our Licensing division and devises ways on improving Licensing's interaction with licensees.
- TLC's Director of Training: Oversees customer service training for the agency.

## **V. Service Provision Plan**

The TLC is committed to providing over-the-phone and service center interpretation for its LEP and non-English speaking customers.

TLC is not currently planning to translate documents due to limited resources and the wide range of languages spoken by our licensees. Each year, the prospect of document and website translation will be reviewed. In terms of the TLC website, the agency will rely on the possibility that web translation may be provided through a policy managed by the Mayor's Customer Service Group.

### Over-the-phone

- TLC is tracking the language needs of its licensees at its Licensing facility, TLC Courts, and the Call Center.
- TLC will implement a private telephone interpretation service, Language Line, to provide interpretation services for its Call Center, licensing division, and over-the-phone court hearings.
- TLC currently has bilingual staff in all of its facilities who can assist with over-the-phone translations.
- TLC expects approximately 50 interpretation requests this year through its Call Center. TLC currently receives between 2 – 5 requests for interpretation at our Courts each week. We expect this to increase to approximately 500 requests per year. In the Licensing Division, there are already approximately 75 requests a week. TLC does not have the budget to accommodate all of these interpretation requests and will initially focus on using Language Line in its Courts and relying on staff services in Licensing and the Call Center.

### Service Centers

- In our licensing facility, a customer service unit interacts with licensees while they wait to be called upon for service to ensure that they have all their paperwork filled correctly. This unit is staffed by three individuals, all of whom are bilingual.
- In our court proceedings, a licensee may request an adjournment because he or she needs a interpreter.

### Identifying LEP Status

Once staff has identified an LEP customer's primary language, they should issue an "I speak..." card to the customer. However, if staff cannot identify a customer's primary language, here are the steps they will take to identify the language.

- TLC staff will ask the customer "what is their primary language?"
- If TLC staff cannot identify the language of the customer by asking, they should then use a language identification sheet to ascertain a customer's primary language.
- If the licensee does not respond to the previous steps, staff should use telephone identification with Language Line.
- Training will coincide with the implementation of a new customer service training course. (4<sup>th</sup> Quarter of 2009)

### Signage

- In 2008, signage in our Licensing and Adjudications facility was rewritten in plain language and redesigned to be more user-friendly.
- Signage for our courts has been translated into Spanish.
- TLC will have all its signage at Licensing and its courts translated into Spanish. (End of 2009)

### Outreach to licensees about language services

- Industry-wide notice will be sent out alerting licensees of the new Language Line service. (March 2009)
  - The agency will make an effort to have ethnic, taxi industry focused periodicals print translated versions of the notice.
- Signage will be posted at our Licensing and Adjudications facilities alerting licensees of the new Language Line services. (March 2009)

## **VI. Training**

To ensure staff is capable of addressing the needs of LEP and non-English speaking customers, the following training measures will be implemented:

- TLC's Director of Training will train Call Center, Licensing, and Adjudications staff on how to use their telephonic interpretation services. At these sessions, the trainer will reach out to participants about the Language Bank. (February 2009)
- Future customer service training for front-line staff will include training on plain language writing, language access for LEP and non-English customers and cultural competency. (4<sup>th</sup> Quarter of 2009)
  - This course should last 2-3 hours and will be provided to all front line staff

- Staff that joins the Volunteer Language Bank will get trained on cultural competency. (By end of 2<sup>nd</sup> quarter 2010)

## **VII. Record Keeping and Evaluation**

TLC will evaluate its language access plan periodically:

- Annual survey of licensees at our Licensing facility
- Tracking interpretation services used by language and facility through Language Line and the Volunteer Language Bank.
- Monitoring licensee language preferences as indicated on their TLC license applications. This will be tracked through the licensee database that is currently in use.
- Semi-annual quality assurance exercises, where LEP and non-English speaking licensees will be approached in our Licensing facility and asked to participate. They will be asked to call or visit a TLC facility and request interpretation services. TLC's Customer Service Unit will also hold an annual focus group on Language Access. 2009 will be the first year the focus group will take place

## **VIII. Resource Analysis and Planning**

TLC will continue working with the Mayor's Office and the Mayor's Customer Service Group on language access and customer service.

- TLC will utilize the "I Speak" cards, language identification sheet and customer service training that is developed through the customer service initiative, as well as other resources as they evolve. (by end of 2009)
- TLC will utilize Web site translations if the Mayor's office is able to provide assistance. (whenever available)
- The agency will take advantage of resources these offices have readily available, such as the "Easy-To-Read" Web site and plain language dictionary. (as part of customer service training throughout 2009 and ongoing).
- TLC has its Language Line contract in place.