

# **Annual Report on Implementation of Language Access**

## **New York City Taxi and Limousine Commission**

**3/29/2019**

**This annual report provides an update on the agency's implementation of its Language Access Implementation Plan, as required by Local Law 30 (2017). The report covers activity during calendar year 2018.**

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



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## Section 1: Agency Information

<b>Agency name</b>	<b>New York City Taxi and Limousine Commission</b>
<b>Name of the agency's Language Access Coordinator (LAC) and all office titles held by this individual.</b>	<b>Wendy Marte Pilar, Language Access Coordinator &amp; Policy Analyst</b>
<b>Link to the agency's Language Access Implementation Plan (LAIP) posted on the agency's website.</b>	<b><a href="https://www1.nyc.gov/site/tlc/about/language_access.page">https://www1.nyc.gov/site/tlc/about/language_access.page</a></b>
<b>Year the LAIP was last updated</b>	<b>2018</b>



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## **Section 2: Agency language access policy and goals**

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

One of TLC's overarching goals is to provide quality customer service to our licensees and members of the public, including those who have limited-English proficiency (LEP), through in-person interactions at our facilities, conversations on the telephone or via e-mail and written correspondence. Our Language Access Plan includes policies which help ensure all information an individual would need to get or maintain a TLC license is translated into the top ten list of citywide designated languages. Additionally, we translate into the top ten languages important public information, such as passenger bills of rights and information on how to locate lost property or file a complaint. The Language Access Coordinator and the Language Access Cabinet monitor the Agency's language access policy on a regular basis to ensure all divisions are following the policies identified in this plan.



### **Section 3: Provision of language services**

(Refer to Administrative Code §23-1102 a.; §23-1102 b. (2, 5, 6, 7, 11); §23-1102 c.)

#### *1.- Subcategory: Translation*

(§23-1102 a.(1))

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

**Identify any relevant goals from the agency’s most recent LAIP, progress toward those goals, and any related accomplishments.**

During Calendar Year 2018, the TLC used the services of Geneva Worldwide Inc. to translate documents into 13 languages (Arabic, Bengali, Simplified Chinese, French, Haitian Creole, Korean, Polish, Russian, Spanish, Urdu, Hindi, Punjabi, and Tibetan). Out of all translated documents and communications, 59 were determined to be essential for individuals to obtain or maintain a license, and as such were translated into the top 10 list of citywide designated languages. Our essential communications include industry notices, which are emailed to TLC licensees and posted on our website, licensing guides, information posters and fliers, the monthly “Commissioner’s Corner” column printed in various industry newspapers, half of which are ethnic newspapers, and emails inviting licensees to TLC resource events. TLC’s reviewers which include employees within the TLC, staff from TLC-Approved Driver Education, and staff from TLC industry stakeholders help 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. Should no bilingual staff be available to review translated materials, requests for volunteers are made through the Citywide Language Bank.

#### *2 - Subcategory: Telephonic Interpretation*

(§23-1102 a.(2) and §23-1102 c.)

**Describe the progress the agency has made providing telephonic interpretation during the previous calendar year.**

**Identify any relevant goals from the agency’s most recent LAIP, progress toward those goals, and any related accomplishments.**

TLC uses Language Line Solutions, Inc. for telephonic interpretation available in 240 languages. TLC staff have easy access to the phone interpretation guides through the agency’s intranet pages. Additionally, language service cards and multilingual signage are displayed at our facilities to help identify the



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primary languages of LEP customers. During Calendar Year 2018, staff communicated with LEP- customers in-person and over-the-phone using phone interpretation for 9,184 calls in 39 languages.

*3 - Subcategory: In-Person Interpretation*

(§23-1102 a.(2))

**Describe the progress the agency has made providing in-person interpretation during the previous calendar year.**

**Identify any relevant goals from the agency's most recent LAIP, progress toward those goals, and any related accomplishments.**

During the first half of 2018, TLC provided in-person interpretation through Accurate Communication. Since the summer of 2018, we provide in-person interpretation at our outreach events and public hearings through Geneva Worldwide, Inc. During 2018, we expanded to offer simultaneous interpretation in Spanish and Mandarin at certain events where large numbers of LEP attendees were expected. In our emails inviting licensees to our events we include the languages in which interpretation services will be available. During 2019, we will evaluate options to purchase simultaneous interpretation equipment to offer this service in all the events where a large number of LEP attendees are expected.

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

(§23-1102 a.(3))

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

**Identify any relevant goals from the agency's most recent LAIP, progress toward those goals, and any related accomplishments.**

TLC uses language service cards at facility counters and displayed signage to help identify the primary languages of LEP customers. In 2018, we installed permanent framed signs to make sure they are always visible for LEP customers needed interpretation services.

*5 - Subcategory: Emergency Preparedness and Language Access*

(§23-1102 b.(5))



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

**Identify any relevant goals from the agency’s most recent LAIP, progress toward those goals, and any related accomplishments.**

During 2018, TLC created a bank of language for emergency communications that will be translated in 2019 into the top 10 languages. TLC will also incorporate services for LEP licensees as part of TLC’s business of continuity planning.

*6 - Subcategory: Language Access Considerations in Agency Communications*  
(§23-1102 b.(6))

**Describe your agency’s progress toward making other types of agency communications (such as emergency notifications, public hearings and events, press releases, website content, social media, and other communications to the public) accessible to individuals and/or communities with Limited English Proficiency (LEP).**

**Identify any relevant goals from the agency’s most recent LAIP, progress toward those goals, and any related accomplishments.**

Emails informing drivers of upcoming events, new TLC rules, opening/closing of TLC facilities, and other resources are translated into the top 10 languages. Industry notices and Commissioner’s Corner Columns are translated into the top 10 languages and available on the TLC website:

<https://www1.nyc.gov/site/tlc/about/tlc-news.page>. During 2019 we will continue to make our essential documents available on the website in the top 10 languages.

*7 - Subcategory: Plain Language*  
(§23-1102 b.(7))

**Describe the agency’s progress in ensuring that communications with the public are in plain language.**

**Identify any relevant goals from the agency’s most recent LAIP, progress toward those goals, and any related accomplishments.**

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 or not the document is “essential” (information necessary to obtain or maintain a TLC license) and, as such, should be translated into the top 10 citywide designated languages.



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*8 - Subcategory: Licenses, Permits, and Registrations*  
(§23-1102 b.(12))

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

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

**Identify any relevant goals from the agency’s most recent LAIP, progress toward those goals, and any related accomplishments.**

To obtain and maintain a TLC license, drivers must meet education requirements that include the 24- hour TLC Driver Education Course, the TLC Driver License Exam, and the Passenger Assistance and Wheelchair Accessible Vehicle (WAV) Training. TLC creates educational materials, such as translated glossaries of terms and study guides in various languages to ensure that LEP customers can successfully take and pass our education requirements needed to obtain a license.

Before taking the required TLC Driver License Exam, applicants must take the 24-hour training course with an approved education provider. All providers must apply for TLC approval of their English-language curriculum and their pedagogy through a rigorous application process to be authorized to offer the course. Once an education provider is approved, they can offer the 24-hour TLC Driver Education Course in any of the languages that the TLC Driver License Exam is available in. Education providers may also offer language assistance for languages that do not have the course or exam available in, or for those applicants wishing to take the course in English with additional help in a language they are more comfortable in. There are currently eight authorized education providers for the 24-hour TLC Driver Education course with 12 locations across the city. As of March 2019, the following language options are available in the following number of locations:

Language	24-Hour Course*	Language Assistance
English	12	0
ASL	1	0
Arabic	5	0
Bengali	4	1
Cantonese	0	2
French	0	2
H. Creole	0	1
Hindi	0	5
Hindko	0	1
Mandarin	4	3



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Nepali	0	1
Punjabi	0	4
Pashto	0	3
Portuguese	0	1
Russian	2	0
Shanghainese	0	1
Spanish	7	5
Urdu	4	3

\*The TLC Driver Education website contains a list of authorized 24-hour TLC Driver Education Course education providers, along with the language offerings each one has per location. The names of the language offerings are translated into that language, for example, “Course offering: Spanish (Español).”

After completing the 24-hour required education course in their language of preference, drivers must take and pass the TLC Driver License Exam. The TLC Driver License Exam is a computer-based exam and a licensure requirement for applicants. The exam consists of 80 multiple-choice questions covering topics such as TLC rules, safe driving, customer service, accessibility, and geography. The exam duration is two hours, and is currently offered in 7 languages: Arabic, Bengali, Simplified Chinese, English, Russian, Spanish and Urdu. Our free study guides and practice exams are also available on the TLC Driver Education webpage ([www.nyc.gov/tlcdrivereducation](http://www.nyc.gov/tlcdrivereducation)) in the same 7 languages. In 2019 we plan to expand the test and the study materials into the additional four languages in the City’s list of top 10 languages: French, Haitian Creole, Korean, and Polish.

**New E-Testing Vendor and Language Services**

As of January 1, 2019, all TLC Driver License Exams are administered through a new e-testing vendor, PSI Services. This vendor will be able to expand the various language access and accommodation services available to applicants, available through the registration and exam-taking process.

**Customer Service: Call Center and Informational Materials**

The new e-testing vendor requires applicants to register for an account online. Drivers receive a link to the PSI website via email after completing the 24-hour TLC Driver Education Course. The email contains instructions on how to create an account with PSI Services and schedule an exam. For registration and exam information, the vendor provides the following language services:

1. A full-time, multi-lingual operations manager to assist TLC with exam operations
2. Multilingual Customer Service Representatives
3. Access to interpreters on the phone through Language Line at PSI’s call center





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4. Training for PSI's Call Center Representatives on assisting Limited English Proficient applicants through Language Line or Live Person Chat translation
5. The following training and information materials are translated into all languages the TLC Driver License Exam is in, including:
  - a. Tutorial videos on how to use the testing software available to applicants online and before they take the exam
  - b. Instructions on how to register for an exam and make a request for reasonable accommodations

**Testing Centers and Exam Software**

PSI Services has several language services available to applicants taking the exam at their testing centers, from sign-in processes and procedures to the exam-taking experience. The vendor provides the following languages services:

1. Multilingual staff at various testing locations
2. Access to interpreters on the phone through Language Line at testing locations to interpret exam rules and procedures
  - a. Interpretation includes American Sign Language, upon receipt of advance notification from candidate and processing by an ADA specialist at PSI Services.
3. Screen reading technology in all the languages the TLC Driver License Exam is offered in.
  - a. Translated exam software interface, which includes the exam, instructions, and the option to toggle between the target language and the English source text during the test.



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## **Section 4: Training**

(Refer to §23-1102 b.(8))

**Describe the agency's progress in developing training on laws and agency policies and protocols on language access, and in training staff.**

**Identify any relevant goals from the agency's most recent LAIP, progress toward those goals, and any related accomplishments.**

TLC training unit trains all frontline staff on language access services. This training includes resources on how to identify an individual's primary language and how to utilize the telephonic interpretation services. Additionally, the training unit, in conjunction with human resources, provides diversity awareness training at each TLC location. Training goals for 2019 include reviewing new-hire training materials to ensure all staff receive updated language access training as part of the onboarding process. Additionally, TLC will use the onboarding process to identify bilingual staff willing to provide interpretation and translation services.



## **Section 5: Record keeping and evaluation**

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

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

**Identify any relevant goals from the agency's most recent LAIP, progress toward those goals, and any related accomplishments.**

TLC tracks and evaluates language access goals through a combination of indicators. TLC maintains records of the language services provided by the agency through monthly invoices and reports received from our interpretation and translation vendors. The Language Access Coordinator also observes staff servicing clients to monitor the use and quality of services provided by bilingual staff in lieu of services provided through citywide agreements. Additionally, the Language Access Cabinet is comprised of representatives from TLC departments that frequently interact with licensees and the public. Staff from licensing, external affairs, enforcement, prosecution, facilities, safety and emissions, driver education unit, and the Commissioner's office sit on the cabinet. These representatives are charged with ensuring their respective departments follow the policies contained in this Plan. These representatives regularly report the quality of language access services and highlight areas where services should be improved or additional agency support is needed.

In the summer of 2018, the Language Access Coordinator met with Geneva Worldwide, Inc. to discuss recurring quality issues throughout the document translations. The vendor has shown some improvement in the translation quality, but TLC will continue to evaluate and report the quality of the language services.

To help create consistency in TLC's translations and also to serve as an educational resource for applicants and drivers, TLC's Education Services Unit has been developing the TLC Glossary of Terms since 2017. The Glossary consists of over 270 terms related to for-hire driving with definitions written in plain language. The glossary has been translated into Arabic, Bengali, Simplified Chinese, Russian, Spanish and Urdu. Internal staff, external translators and education providers have used the glossaries for translation and educational purposes since their development. The public launch is anticipated in 2019, with plans to expand the glossary into French, Haitian Creole, Korean and Polish.



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In 2017 and 2018, we developed two style guides to assist with translation. The style guides provide information on the tone, plain language style, and type of terminology the TLC would like translators to follow, as well as some specific translation instructions. They also include information on the audience and the agency's key objectives in communication.

The first is a general style guide for translators that addresses those themes as they apply broadly across languages. The second style guide is a Spanish language style guide with additional instructions and specific examples for the considerations of that particular language. Our goals for 2019 include to begin developing additional style guides for the languages in the City's top 10 list.



## **Section 6: Resource analysis and planning**

(Refer to §23-1102 b.(11))

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

**Identify any relevant goals from the agency's most recent LAIP, progress toward those goals, and any related accomplishments.**

TLC data shows that over half of all drivers hail from five countries: Bangladesh, the Dominican Republic, Pakistan, the United States, and India, although TLC does not have accurate data on the number of LEP drivers, given the percentage of immigrants drivers we will continue to devote resources to translate our essential documents into the top 10 languages, but also continue to take into consideration languages such as Hindi and Punjabi that are not included in the top 10, but are common in our population.

To facilitate language access on our Public Hearings, we have devoted additional resources for simultaneous interpretation. In 2019, we are evaluating options to procure simultaneous interpretation equipment. Additionally, we implemented staffing changes in our Woodside Inspection facility by adding a Spanish-speaking supervisor to assist Spanish-speaking drivers that bring their vehicles for inspection. Staff are trained on how to use Language Line and headsets are provided to service any non-Spanish speaking LEP licensees.



## **Section 7: Outreach and public awareness of language access services**

(Refer to §23-1102 b.(9))

**Describe the progress your agency has made in implementing strategies and outreach activities that will create public awareness of your agency's language assistance services. Include any updates regarding public awareness of the 311 Language Access complaint system.**

**Identify any relevant goals from the agency's most recent LAIP, progress toward those goals, and any related accomplishments.**

TLC promotes public awareness of language access services through signage at all TLC facilities, posting translations on the agency's website, and distributing translated materials throughout the city.

To increase public awareness of the 311 Language Access Complaint System in 2019, we will update the Language Access page on our website to include this information.

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. Our outreach efforts during 2018 included TLC In Your Borough (TIYB) events in all five boroughs, House of Worship Series at Sikh temples, mosques, and Christian churches, and driver focus groups in preparation for TLC's new Office of Inclusion and the Service Refusal Campaign of 2019. Additionally, we tabled at and supported events hosted by other city agencies and elected officials. These events include City Hall in Your Borough (CHYIB), Small Business Services (SBS) resource fairs, Lunar New Year Celebration in Queens, Car Free Earth Day, and others. Before attending outreach events, the External Affairs team assesses the need for in-person interpretation and through driver intake forms individuals' preferred languages are recorded and tracked. We provide in-person interpretation at our outreach events where LEP customers are expected to attend and bring our frequently used documents translated into the languages pertaining to each community.

In preparation for our Driver Pay, For-Hire Vehicle Accessibility, and Service Refusal campaigns of 2019, we dedicated resources in 2018 to translate materials into the top 10 citywide designated languages. Our goals for 2019 include distributing these materials at all of our events as well mailing it to libraries, community organizations, and elected officials offices. Additionally, as part of our new Driver Pay Protections, we produced an explanatory video with voice over in English and Spanish and subtitles in the rest of the top citywide languages. During 2019, we are sharing the videos on the agency's social media accounts, and making them accessible through TLC website:



(<https://www1.nyc.gov/site/tlc/about/driver-pay.page>) and our YouTube channel (<https://www.youtube.com/user/NYCTaxiChannel/videos>).

## **Section 8: Language Access complaints**

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

### **1 - Describe how members of the public can submit language access complaints, questions and requests to the agency.**

Members of 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](mailto:tlcexternalaffairs@tlc.nyc.gov). Additionally, members of the Language Access Cabinet notify the Language Access Coordinator if their corresponding units receive Language Access Complaints.

### **2 - How many *language access complaints* did the agency receive via 311 during the previous calendar year? How were they handled?**

In 2018, TLC did not receive any language access complaints via 311.

### **3 - How many *requests for language access services*\* did the agency receive through 311 during the previous calendar year? How were they handled?**

During the summer of 2018, we received a request to provide additional bilingual staff at our Woodside Inspection Facility. This facility now has a bilingual Captain fluent in Spanish who assists drivers who visit the facility for vehicle inspection. During 2019, we will continue to evaluate what other language resources we can provide at this facility.

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



## **Section 9: Language Access Goals**

### **List your agency's language access goals for Calendar Year 2019.**

The Language Access Coordinator and Cabinet meet twice a year to discuss the progress on the agency's language access goals, ensure major milestones are met, and to make any necessary revisions to the agency's Local Law 30 Implementation Plan. TLC's Language Access Goals for 2019 are as follows:

- Evaluate options to purchase simultaneous interpretation equipment.
- Train frontline staff on language access and evaluate options for a language certification program.
- Expand the TLC Driver License Exam, study guides, and practice exams into the additional four languages in the City's list of top 10 languages spoken: French, Haitian Creole, Korean, and Polish.
- Publish glossaries in Arabic, Bengali, Simplified Chinese, Russian, Spanish, and Urdu, and continue developing glossaries in French, Haitian Creole, Korean, and Polish.
- Begin developing new style guides for the languages in the City's top 10 list.
- Incorporate comprehensive language access provisions in the agency's continuity of operations plan (COOP).
- Update our Language Access webpage to include instructions on filing a Language Access complaint using 311.
- Distribute 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.