



# 2019 Annual Language Access Report

**NYC Taxi & Limousine Commission**

**4/24/2020**

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 2019.

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



## Section 1: Agency Information

<b>Agency name</b>	New York City Taxi and Limousine Commission (TLC)
<b>Name of the agency's Language Access Coordinator (LAC) and all office titles held by this individual.</b>	Wendy Marte Pilar, Language Access Coordinator, Policy Analyst, Office of External Affairs
<b>Link to the agency's Language Access Implementation Plan (LAIP) posted on the agency's website.</b>	Read <a href="#">TLC's 2018 Language Access Implementation Plan</a>
<b>Year the LAIP was last updated</b>	2018



## Section 2: Agency language access policy

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

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 over 100 different languages.

It is our language access policy to:

- Provide LEP individuals with 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



## Section 3: Language Access Accomplishments

**Identify your agency's language access accomplishments during calendar year 2019 (CY19).**

During CY 2019, the TLC continued to translate into the top 10 languages all Industry Notices, the monthly Commissioner's Corner Newsletter, and licensee-wide general outreach emails notifying licensees about TLC events and resources. As part of our ongoing work to make the licensing process more accessible for LEP individuals, we translated three essential licensing guides (FHV Inspection Guide, Lease to Own Guide, FHV Pause Explainer) and one licensing form (Driver Applicant Medical Form) into the top 10 languages.

Other 2019 TLC Language Access highlights include:

- Translation of three licensee surveys into the top 10 languages:
  - "Medallion Owner Surveys" of current financial situation of medallion owners
  - "Driver Assistance Center Survey" in preparation of TLC's new Driver Assistance Center that is launching in Spring 2020
  - "For-Hire Vehicle Leasing & Insurance Agreements and Expenses Survey" as part of our research into the costs of for-hire vehicle leasing and the practices of leasing companies
  
- Publishing two videos with multilingual subtitles on the agency's YouTube channel ([www.youtube.com/user/NYCTaxiChannel/videos](http://www.youtube.com/user/NYCTaxiChannel/videos)):
  - Service Refusal PSA in the top 10 plus Hindi and Punjabi
  - Driver Income Rules video in the top 10 languages
  
- Translation of public materials for our passenger safety #PlateSafe campaign into the top 10 languages
  
- Mailing translated palm cards of our Accessibility and Inclusion/Service Refusal campaigns to New York City Housing Authority (NYCHA) buildings, elected officials' district offices, the NYC Parks Department's recreation centers, public libraries across the five boroughs, and industry stakeholder groups.

Additionally, all staff working at our customer-facing facility in Long Island City received refresher training on Language Access during the fall of 2019.



## Section 4: Language Access Goals

Identify the agency’s language access goals from its most recent Language Access Annual Report. Describe the progress you have made in reaching those goals.

Language Access Goals in CY 2018 Report	Progress as of April 2020
<p>Evaluate options to purchase simultaneous interpretation equipment.</p>	<p>During CY 2019, TLC evaluated its current and anticipated need for simultaneous interpretation for public hearings and large public meetings and events and consulted with the Mayor’s Office of Immigrant Affairs (MOIA) regarding options for purchasing simultaneous interpretation equipment.</p> <p>The agency determined the need for simultaneous interpretation equipment can continue to be met through existing contracted services. Therefore, during CY 2020, TLC will continue to use the in-person interpretation vendor under the Department of Citywide Administrative Services (DCAS) contract to secure simultaneous or consecutive interpretation as needed for public hearings and outreach events.</p>
<p>Train frontline staff on language access and evaluate options for a language certification program.</p>	<p>TLC’s Language Access Coordinator worked with the agency’s Training Unit to provide all customer-facing staff a refresher on language access requirements and best practices.</p> <p>Additionally, the acting TLC Commissioner/Chair sent an agency-wide reminder emphasizing the agency’s commitment to providing meaningful language access in written, in-person, and over-the-phone interactions as well as instructions on how and when to access telephonic interpreters.</p>
<p>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.</p> <p>Publish glossaries in Arabic, Bengali, Simplified Chinese, Russian, Spanish, and</p>	<p>TLC’s study guides and practice exams are available on the TLC Driver Education webpage (<a href="http://www.nyc.gov/tlcdrivereducation">www.nyc.gov/tlcdrivereducation</a>) in 7 languages: Arabic, Bengali, Simplified Chinese, Russian, Spanish, and Urdu.</p> <p>By 2022, we plan to expand the course, exam, and the study materials into the additional four languages</p>

<p>Urdu, and continue developing glossaries in French, Haitian Creole, Korean, and Polish.</p> <p>Begin developing new style guides for the languages in the City’s top 10 list.</p>	<p>in the City’s list of top 10 languages: French, Haitian Creole, Korean, and Polish.</p>
<p>Incorporate comprehensive language access provisions in the agency’s continuity of operations plan (COOP).</p>	<p>TLC has a translated bank of standard emergency messages in to top 10 City-mandated languages as well as Hindi and Punjabi.</p>
<p>Update our Language Access webpage to include instructions on filing a Language Access complaint using 311.</p>	<p>The TLC’s language access page (<a href="http://www1.nyc.gov/site/tlc/about/language_access.page">www1.nyc.gov/site/tlc/about/language_access.page</a>) has updated information on how to file a complaint via 311.</p>
<p>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.</p>	<p>During CY 2019, the TLC mailed translated palm cards of our Accessibility and Inclusion/Service Refusal campaigns to New York City Housing Authority (NYCHA) buildings, elected officials’ district offices, the NYC Parks Department’s recreation centers, and public libraries across the five boroughs, and industry stakeholder groups.</p>



## Section 5: 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))

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

During Calendar Year 2019, the TLC used the services of Geneva Worldwide, Inc. to translate over 90 source English documents and communications into at least one of 14 languages (Arabic, Bengali, Simplified Chinese, French, Haitian Creole, Korean, Polish, Russian, Spanish, Urdu, Hindi, Punjabi, and Tibetan) producing over 800 pieces of translated materials. Out of all translated materials, 77 source English documents and communications were considered essential for TLC licensees and members of the public, and as such, were translated into the top 10 City-designated languages. 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 utilizes employees within the TLC, staff from TLC-Approved Driver Education, and staff from TLC industry stakeholders to 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. 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).

To increase access and visibility of its translated materials, in CY 2020, TLC will modify its language access webpage to serve as a one-stop-shop for all public-facing translated documents.



*2 - Subcategory: Telephonic Interpretation*

(§23-1102 a.(2) and §23-1102 c.)

**Identify the progress the agency has made providing telephonic interpretation during CY19.**

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 that contain instructions on how to access a phone interpreter easily.

TLC currently uses the vendor Voiance Language Services, LLC. for telephonic interpretation, and before December 2019, the agency used Language Line Solutions. To support the transition to the new vendor, the Language Access Coordinator met with the Language Access Cabinet and key supervisors during the months leading to the change to ensure the new access instructions and new access codes were distributed to staff in a timely manner.

In CY 2019, TLC staff made a total of 11,368 telephonic interpretation calls to access interpreters in 34 languages.

*3 - Subcategory: In-Person Interpretation*

(§23-1102 a.(2))

**Identify the progress the agency has made providing in-person interpretation during CY19.**

TLC currently uses Accurate Communication, Inc. for in-person interpretation. Before September 2019, TLC used Geneva Worldwide, Inc.

In CY 2019, the TLC provided consecutive interpretation in Urdu, Mandarin, Punjabi, and Nepalese at seven outreach events and simultaneous Spanish interpretation at one public hearing and one House of Worship event.

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.



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

(§23-1102 a.(3))

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

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 state and placement of the signs to ensure compliance.

*5 - Subcategory: Emergency Preparedness and Language Access*

(§23-1102 b.(5))

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



*6 - Subcategory: Multilingual Agency Communications*  
(§23-1102 b.(6))

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

TLC makes its agency communications accessible to individuals and communities with LE) by:

- Sending industry-wide email blasts about upcoming events, resources, and rules in the top 10 languages, as well as occasionally in the non-top 10 TLC priority languages, Hindi and Punjabi
  - During CY 2019, TLC improved the layout and navigation of its multilingual email communications by incorporating anchor links and translated language tags
- Posting translated documents such as licensing guides and Industry Notices to agency website ([www.nyc.gov/tlc](http://www.nyc.gov/tlc))
- Posting subtitled videos to the agency’s YouTube channel ([www.youtube.com/user/NYCTaxiChannel/videos](http://www.youtube.com/user/NYCTaxiChannel/videos))
- Sharing with ethnic press and media the translated monthly Commissioner’s Corner column—a newsletter written by the TLC Commissioner/Chair discussing events and topics that are relevant to the TLC’s regulated industries
- Mailing translated palm cards of our Accessibility and Inclusion/Service Refusal campaigns to NYCHA buildings, elected officials’ district offices, the NYC Parks Department’s recreation centers, public libraries across the five boroughs, and industry stakeholder groups
- Providing simultaneous interpretation at Commission Hearings in which large numbers of LEPs are expected to attend
- Providing consecutive interpreters at low-scale outreach events

In CY 2020, TLC will continue making its communications accessible through the above methods but will also modify its language access webpage to serve as a one-stop-shop for all public-facing translated documents. Additionally, we will gradually enhance our online portals ([www.nyc.gov/lars](http://www.nyc.gov/lars) and [www.nyc.gov/tlcup](http://www.nyc.gov/tlcup)) to include links to translated materials.



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

**Identify the agency’s progress in ensuring that communications with the public are in 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.

In CY 2020, TLC will continue conducting plain language reviews of all its public-facing documents before translation.

*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, identify its progress toward providing language access when issuing licenses, permits, and registrations.**

As part of TLC’s ongoing efforts to make the licensing process more accessible for LEPs, in CY 2019 we translated three essential licensing guides (For-Hire Vehicle Inspection Guide, Lease to Own Guide, and For-Hire Vehicle Pause Explainer) and one licensing form (Driver Applicant Medical Form) into the top 10 languages.

In CY 2020, TLC will continue expanding language access services for the purposes of issuing a license, permit, or registration. CY 2020 goals include identifying and translating essential licensing forms and supporting materials such as checklists and guides, modifying the language access page on our [nyc.gov/tlc](http://nyc.gov/tlc) website to serve as a one-stop-shop for all translated documents, and enhancing our online portals ([www.nyc.gov/lars](http://www.nyc.gov/lars) and [www.nyc.gov/tlcup](http://www.nyc.gov/tlcup)) by including useful multilingual instructions on how to obtain help in multiple languages and including links to translated materials.

Beyond translating our essential licensing materials and enhancing our online platforms, additional language access is already available for the TLC Driver License Exam process. The required TLC Driver License Exam, administered by the external vendor PSI Services, 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 seven languages. By 2022, we plan to expand the course, exam, and the study materials into the additional four languages in the City’s list of top 10 languages: French, Haitian Creole, Korean, and Polish.



Additionally, the external vendor PSI Services has expanded language access and accommodation services available to applicants through the registration and exam-taking process.

To assist with registration, the vendor provides:

1. A full-time, multilingual 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
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

At the testing centers, the vendor provides:

1. Multilingual staff
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. An exam software interface that gives applicants the ability to toggle between the target language and the English source text during the exam.
4. Screen reading technology in all the languages the TLC Driver License Exam is offered in, so the applicant can hear the question and answer choices in either English or their target language.



## Section 6: Training

(Refer to §23-1102 b.(8))

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

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.

In CY 2020, the Language Access Coordinator will work with TLC's Training Unit to develop an agency-wide Language Access online training.



## Section 7: Record keeping and evaluation

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

**Identify 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."**

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 place of services provided through citywide agreements. 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.

To help create consistency in TLC's translations, the agency developed the TLC Glossary of Terms in 7 languages: Arabic, Bengali, Simplified Chinese, Russian, Spanish, French, and Urdu. The glossary consists of over 270 terms related to for-hire driving with definitions written in plain language. It has been provided to the document translation vendor and is also used by:

- Internal bilingual staff who serve as subject-matter experts to review translated documents and communications before they are published.
- External consultants certified by the American Translators Association (ATA) who review TLC's translated driver education content
- TLC education providers who instruct potential and current licensees in multiple languages in preparation for the TLC Driver Exam



## Section 8: Resource analysis and planning

(Refer to §23-1102 b.(11))

**Identify 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.”**

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 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.

The TLC has allocated contracted services from September 2019 through June 2021 to continue to provide language services to all licensees and members of the public. In addition to the contracted services below, TLC procures document translation review services of multilingual consultants certified by the American Translators Association (ATA).

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 Interpretation (Consecutive and Simultaneous)	Accurate Communication, Inc.	\$86,331.20



## Section 9: Outreach and public awareness of language access services

(Refer to §23-1102 b.(9))

**Identify the progress your agency has made in implementing strategies and outreach activities that will create public awareness of your agency's language assistance services.**

**NOTE:** This item refers to strategies and outreach activities specifically about the availability of language assistance services provided by your agency, *not* multilingual outreach about your agency and its services or programs.

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

In 2020, TLC will revise its Language Access webpage to include a list of translated materials and information about the availability of free language services.



## Section 10: 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 (in addition to making a complaint via 311).**

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 any Language Access Complaints.

### **2 - How many *language access complaints* did the agency receive via 311 during CY19? Describe how each of these complaints were resolved.**

TLC did not receive any language access complaints via 311 during CY19.

### **3 – How many *language access complaints* did the agency receive via channels other than 311 during CY19? Describe how each of these complaints were resolved.**

In CY19, TLC received one language access complaint via its External Affairs inbox ([tlcexternalaffairs@tlc.nyc.gov](mailto:tlcexternalaffairs@tlc.nyc.gov)) from a licensed driver who inquired about the license renewal process and did not receive language assistance at one of our facilities. The Language Access Coordinator worked with the customer-facing unit involved to ensure staff were reminded of their language access duties. A member of TLC's External Affairs team communicated with the driver in his preferred language and provided with the requested translated information.

### **4 - How many *requests for language access services\** did the agency receive through 311 during CY19? How were they handled?**

TLC did not receive any requests for language access services through 311 during CY19.

### **5 - How many *requests for language access services\** did the agency receive through channels other than 311 during CY19? How were they handled?**

TLC did not receive any requests for language access services through channels other than 311 during CY19.



**6 - Describe the agency's efforts to ensure public awareness of the 311 Language Access complaint system.**

TLC's language access webpage has been updated to inform the public that they can submit language access complaints through 311 or email the Language Access Coordinator at [tlcexternalaffairs@tlc.nyc.gov](mailto:tlcexternalaffairs@tlc.nyc.gov).

**\*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 11: Language Access Goals

List your agency's language access goals for Calendar Year 2020.

TLC's language access goals for Calendar Year 2020 are to:

- Expand language access services for the purposes of issuing a license, permit, or registration, as per Local Law 30 requirements, by:
  - Identifying and translating into the top 10 languages the most-commonly distributed and most-commonly accessed documents associated with TLC's licensing transactions
  - Dedicating space on our website to serve as a one-stop-shop for all translated documents
  - Adapting our online portals ([www.nyc.gov/lars](http://www.nyc.gov/lars) and [www.nyc.gov/tlcup](http://www.nyc.gov/tlcup)) for a multilingual audience by including useful multilingual instructions on how to obtain help in multiple languages and including links to translated materials
- Develop an agency-wide Language Access online training
- Continue expanding the TLC Driver Education course, exam, and study guide materials into additional languages to meet our goal of top 10 languages by 2022