



New York City Taxi and Limousine Commission
Language Access Implementation Plan
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Language Access Coordinator: Malcolm Cain

1. Agency Mission and Background

The New York City Taxi and Limousine Commission (TLC) is a licensing and regulatory agency that oversees private for-hire transportation in New York City. TLC provides direct services to TLC licensees and members of the public on a daily basis at three primary facilities in Manhattan, Long Island City, and Woodside. Through our licensing facility, TLC licenses over 180,000 drivers and 130,000 vehicles that operate in the taxi and for-hire industries, as well as associated bases and other businesses. At our Woodside facility, TLC inspectors complete safety and emissions inspections on all TLC-licensed vehicles. And from our Manhattan headquarters, TLC's External Affairs team provides licensees, potential licensees and the riding public information and assistance through online content, industry emails, palm cards and at TLC information events held throughout the City.

2. Agency Language Access Goals

One of the agency'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. Specifically, the agency's 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, the Plan includes policies concerning the translation of important public information, such as passenger bills of right as well as 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.

3. LEP Population Assessment

3.1 Proportion of LEP population

Drivers represent the largest category of licensee, with over 180,000 currently licensed by TLC. Many of these drivers also hold additional TLC licenses (for example, drivers often own the vehicles they operate



and as such are licensed as both drivers and vehicle owners). Accordingly, for purposes of this section, data on drivers will be used to assess the LEP population TLC serves.

Based on U.S. census data, over 3,000,000 New Yorkers (approximately 35%) were born in another country and approximately 25% of residents have LEP. TLC data show that approximately 92% of licensed drivers were born in another country. Although TLC does not have accurate data on the number of LEP drivers, given that the percentage of drivers who are immigrants is significantly higher than the percentage reported for all residents, it is reasonably assumed that the proportion drivers who have LEP is also higher than the 25% reported citywide. Therefore, TLC estimates the population of LEP drivers well exceeds 45,000 individuals.

3.2 LEP contact frequency

TLC staff has regular and frequent contact with our licensees and members of the public. On an average day, 600 individuals are seen at TLC's Long Island City facility, 455 calls are answered in the call center and over 750 vehicles are inspected at the Woodside inspection facility. Assuming more than a quarter of our licensees have LEP, it is estimated that TLC staff interacts with more than 450 LEP individuals each day.

Additionally, TLC has recently undertaken a major initiative to significantly increase the number of driver outreach events held throughout the City. These events are an opportunity for drivers to ask important questions and learn about TLC rules and regulations. At these events, any driver that has a question or concern is asked to complete an intake form summarizing the issue. This form includes a question asking for the driver's preferred language. As this dataset grows, information gathered on drivers' preferred language will be used by the Language Access Coordinator to help determine the adequacy of TLC's language access services and inform any necessary policy changes.

3.3 Importance of language access services

The failure to provide language access services to the LEP population would have a negative impact on our licensees and the broad agency charge of furthering safe and reliable for-hire transportation in the City. A prospective driver may not know the process to apply for a TLC license, a vehicle owner may misunderstand the important information a call center representative is providing on the telephone, and a member of the public may be unable to share necessary details when discussing an incident with a TLC prosecutor.

3.4 Available language access resources



To provide necessary language access services, TLC relies, as described in the following section, on bilingual staff as well as citywide contracts with interpretation and translation vendors. In the current fiscal year, TLC budgeted \$80,000 for language access services.

4. Provision of Language Access Services

To ensure the large portion of LEP individuals served by TLC staff receive language access services, TLC provides telephonic interpretation services as specified in a citywide agreement that can be used in-person at a TLC facility or during a telephone conversation with a LEP caller. TLC utilizes language service cards at facility counters and displayed signage to help identify the primary languages of LEP customers.

In addition to interpretation services, TLC uses the services of a translation vendor as specified in a citywide agreement to translate essential public communications. Such communications include industry notices, which are emailed to TLC licensees and posted on our website, licensing guides, information poster and fliers, as well as the monthly “Commissioner’s Corner” column printed in various industry newspapers, half of which are ethnic newspapers. All public-facing documents are reviewed and edited by TLC staff trained in plain language best practices. As part of this review, TLC staff determine if the document is “essential” (information necessary to obtain or maintain a TLC license) and, as such, should be translated.

TLC also relies on bilingual staff who volunteer to provide language access services. These individuals directly serve LEP individuals that contact TLC, offer in-person interpretation at public events and verify the accuracy of translations completed by our vendor. Should no bilingual staff be available to review translated materials, requests for volunteers are made through the Citywide Language Bank.

Future goals for providing language access services include incorporating services for LEP licensees as part of TLC’s business continuity planning. To this end, TLC is creating a bank of language that will be translated and used for emergency communications. Additionally, TLC will post all translated materials on TLC intranet to serve as a centralized resource for TLC staff when serving LEP individuals. Finally, TLC will formalize the process through which an individual can request an interpreter be available at TLC public hearings.

5. Training

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. The Language Access Coordinator will monitor metrics on trainings provided to TLC staff to confirm frontline staff continues receiving periodic language access refresher trainings.



Future goals for training TLC staff on language access policies and procedures include reviewing new-hire training materials to ensure all staff receives 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.

6. Record Keeping and Evaluation

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.

7. Resource Analysis and Planning

Each year, the Language Access Coordinator will review this Plan to confirm all goals and objectives are being met. The Coordinator will also review metrics described above to determine the sufficiency of available resources to meet the needs of the current LEP population and will recommend any necessary changes to resource allocation. The Language Access Cabinet monitors the Agency's language access services to identify gaps in services, offer solutions to close these gaps, and implements changes to improve the quality of language access services provided.

8. Outreach and Public Awareness

TLC promotes public awareness of language access services through signage at all TLC facilities. TLC staff are also trained to identify LEP individuals' preferred language and offer language access services.

Additionally, our External Affairs team provides TLC and other city agencies materials and resources in several languages to our licensees through a bi-monthly newsletter, emails, and phone calls. Before attending outreach events, the External Affairs team assesses the need for in-person interpretation. And through driver intake forms individuals' preferred languages are recorded and tracked. Future goals include adding language on all public hearing notices informing the public how requests for an interpreter can be made before a public hearing.

9. Language Access Complaints

All language access complaints are monitored by the Language Access Coordinator. Staff responsible for the intake and review of 311 complaints as well as written correspondence forward language access complaints to the Coordinator. Additionally, the Language Access Coordinator will work with the Mayor's Office of Immigrant Affairs as well as 311 to ensure these complaints are received and addressed. The number of language access complaints received by the agency will be included in all annual language access assessments.

10. Implementation Plan Logistics

TLC will work to implement the goals identified in this language access plan over the next two years, with regular reporting to the Mayor's Office of Immigrant Affairs through the annual language access assessment. The Language Access Coordinator and Cabinet will work together to take action on the agency's language access goals, ensure major milestones are met, and will make any necessary revisions to this plan.

TLC will expand our current language access services as follows:

- All newly-created essential public communications, including industry notices and informational fliers, are now being translated into the top ten list of citywide designated languages.
- All documents currently translated into the top six preferred languages of our licensees will be translated into the ten languages identified by the Mayor's Office of Immigrant Affairs by July 1, 2018.
- TLC will formalize the process through which interpreters can be requested at public hearings by July 1, 2018, and TLC will notify the public of such process in all public hearing notices published after this date.
- Essential passenger information is now being translated into the top ten list of citywide designated languages. TLC anticipates this work will be complete and posted to the TLC website by December 31, 2018.
- TLC will work to expand translations of TLC-provided driver education materials in 2019.
- New-hire onboarding materials covering the agency's language access policies and procedures will be reviewed and revised as needed in 2019.
- TLC will incorporate comprehensive language access provisions in the agency's continuity of operations plan (COOP) by July 1, 2019.
- TLC will offer the driver exam in the ten languages identified by the Mayor's Office of Immigrant Affairs by July 1, 2020.