

# Language Access Implementation Plan 2021

New York City Department of Transportation  
3/31/2021



**This report provides an update on the agency's implementation of its Language Access Implementation Plan, as required by Local Law 30 (2017).**

# Language Access Implementation Plan - 2021

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## I. Agency name and agency language access coordinator:

**New York City Department of Transportation**

**Deborah Siegel Baker - Language Access Coordinator/Administrative Staff Analyst**

<https://www1.nyc.gov/html/dot/downloads/pdf/dot-language-access-plan-2021.pdf>

## II. Agency mission and background

### A. Mission of the Agency

The New York City Department of Transportation's (NYCDOT) 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. DOT is 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

Over 5,500 employees of NYCDOT oversee one of the most complex urban transportation networks in the world. NYCDOT's staff manage an annual operating budget of \$1.1 billion and a ten-year \$19.7 billion capital program, along with 6,300 miles of streets and highways, over 12,000 miles of sidewalk, and nearly 800 bridges and tunnels, including the iconic East River bridges. NYCDOT's staff also installs and maintains over one million street signs, 13,250 signalized intersections, over 315,000 street lights, and over 350 million linear feet of markings.

It should be noted that certain properties within the jurisdiction of NYC DOT are managed by the New York City Department of Parks and Recreation (NYC Parks) with permission from NYCDOT. Management of these properties by NYC Parks is temporary and is expressly not intended to create public parks or parkland.

NYCDOT promotes the use of sustainable modes of transportation. NYCDOT designs [bicycle facilities](#), bus lanes, and [public plazas](#). NYCDOT operates the [Staten Island Ferry](#), which served nearly 16 million people last year, and oversees ferry operations on City-owned piers. NYC DOT [educates students and adults Citywide about street safety](#). NYCDOT's staff issue [parking permits to people with disabilities](#), not-for-profit agencies and governmental entities, and [commercial vehicle permits for trucks](#); issue construction permits for [work in City streets](#); and manage the City's [Adopt-a-Highway](#) program.

## **B. Comprehensive Description of Services**

NYCDOT is the lead agency in Mayor Bill de Blasio's Vision Zero initiative, the City's systematic groundwork for ending traffic deaths and injuries on our streets. As part of this initiative, NYCDOT has been charged with, among other things, continuing to develop and streamline effective communications to all New Yorkers, whether English-speaking or the Limited English Proficient (LEP) community. Community outreach is a major aspect of NYCDOT's efforts, conducted throughout the five boroughs by multiple NYCDOT Divisions, Units and Offices to maintain, develop and promote transportation initiatives.

NYCDOT continues in its active outreach efforts engaging LEP communities through the provision of agency language services in various communication channels, such as face-to-face at Town Halls, Community Boards, and other outreach events, online through emails, social media, and surveys. NYCDOT invites customer feedback and participation in agency campaigns and the development of various projects such as Vision Zero; Covid-19 Initiatives: Open Streets and Open Restaurants; DWI; Safety Education; Transit Development; Bridge Construction; Truck Traffic; Bike Share; Public Plazas; and Parking Regulations.

NYCDOT's formation and implementation of the NYCDOT Street Ambassador program is an innovative strategy to expand agency outreach and ensure public engagement citywide. Customer-driven in all their activities, NYCDOT Street Ambassadors meet members of the public in their neighborhoods, engaging New Yorkers in the planning and development of NYCDOT projects aimed at safety, mobility, sustainability, and quality of life. NYCDOT Street Ambassadors (some who are bilingual) are committed to meeting people where they are and ensuring that everyone's voice counts, regardless of background or spoken language. The Customer Service, Language Access and Correspondence Unit (CSLACU) supports their efforts providing contracted multilingual and sign language interpretation. NYCDOT's goal is to move the City closer toward an inclusive and just planning process. Street Ambassadors are strategically deployed to busy areas near project sites and directly engage with the public, in the languages spoken in their neighborhoods. Summer Streets and Town Hall Meetings introducing NYCDOT initiatives are additional examples of NYCDOT outreach efforts utilizing Street Ambassadors in collaboration with CSLACU's Language Bank Volunteers (LBVs) and contracted multilingual and sign language interpreters.

CSLACU provides a full-range of language services operating for all customers: one-on-one customer communications; group settings; email and letter responses; fulfilling literature requests; distribution of: Voter Registration forms in multiple languages; distribution of NYCDOT translated materials as well as the installation of and updates to translated NYCDOT signage. NYCDOT supplements contracted language with NYCDOT bilingual employees who volunteer to provide language services. Bilingual employees provide interpretations in one-on-one communications with LEPs and they also review brief translation projects prior to distribution.

NYCDOT also provides the LEP public with both interpretation and translation services, partnering with many agencies and community organizations, including: Transportation Alternatives, The Horticultural Society; Mayor's Office for People with Disabilities; NYC Votes - NYC Campaign Finance Board or New Yorkers for Parks, Offices of the Borough President, and Elected Officials.

NYCDOT's Public Service Centers (PSCs), temporarily closed due to Covid-19 restrictions, offer additional customer service. PSCs are located citywide and, when they reopen post-Covid-19, members of the public will be able to transact business or obtain information in-person related to NYCDOT services such as: Parking Permits; Pre-Paid Parking Card and Municipal Off Street Parking Info; Roadway and sidewalk construction permits; Staten Island Ferry rides; Canopy information and authorization; Oath Violations; Disability, Clergy and other permit types. At these PSCs, customers can also request meetings and reviews with the NYCDOT Office of Construction Mitigation Coordination. CSLACU supports Mayoral initiatives and provides the critical link for LEP clients to communicate with NYCDOT in multiple languages and receive a variety of services. CSLACU provides customer service language programming through DOT's eight PSCs. Programs include language services such as translation, interpretation, transcription and plain language; design and installation of translated signage and materials; ensuring as needed repairs and overall maintenance of facilities; customer service/language access/voter assistance and training.

### III. Agency language access policy and goals

#### A. DOT's Language Access Policies

In September of 2019, Roseann Caruana was appointed the Assistant Commissioner of CSLACU. Roseann Caruana was later appointed as the Acting Staten Island Borough Commissioner in February of 2021. Yashwant (Neil) Sahadeo was appointed the Executive Director of CSLACU in February of 2021. Several of the related functions in the Language Access Unit and the Commissioner's Correspondence and Customer Service Unit were centralized to streamline customer service and improve productivity.

NYCDOT's CSLACU policy is to ensure efficient and equal access to Agency services, communications, programs and events for LEP customers by providing a full range of free language services. Meeting the language needs of all New Yorkers enables them to better access City services with the ultimate goal of increasing safety and improving their quality of life. By prioritizing the translation of License, Permit and Registration applications (LPRs), in accordance with Local Law 30 (LL30) we facilitate New Yorkers' mobility and increase economic opportunity, enabling our customers to better conduct business in and with the City. Translation of educational documents and the provision of in-person interpreters at NYCDOT events or community meetings, enables residents to actively participate in safety education, project planning and other vital City transportation initiatives, campaigns, and programs.

CSLACU is responsible for ensuring the accuracy of all translated materials and streamlining translation and interpretation requests with reduced wait times for translations, including written, in-person or telephonic interpretations. NYCDOT's Language Access policy is driven in support of Mayor Bill de Blasio's initiatives to promote equity and diversity, as well as economic and civic-engagement. This policy is communicated through the inclusion of a Language Access portal on NYCDOT's SharePoint page and direct communication and training of DOT staff. **CSLACU's policy is to:**

- **Continue to provide centralized agency-wide language translation and interpretation services utilized in various channels of agency communications;**
- **Continue to train NYCDOT employees in CSLACU procedures on when and how to provide language services;**
- **Continue to update, maintain and improve CSLACU signage posted in NYCDOT's PSCs and translated information distributed during agency community outreach and special events;**
- **Continue to develop agency-wide translation and interpretation standards and best practices to ensure quality translation and interpretation services while meeting the increased demand for such services;**
- **Continue to upgrade NYCDOT's Language Access Database (LAD) for effective management of language services data;**
- **Continue to develop agency-wide processes and procedures designed to consolidate, simplify and integrate agency content for improved customer language access, readability and effective communication.**

#### B. NYCDOT Language Access Implementation Plan Goals

- Design, translate, produce and install Customer Service Language Access signage in the 10 designated citywide languages by end of FY21
- Upgrade NYCDOT's CSLACU LAD request portal to facilitate a one stop shopping experience for DOT project managers to request both translation and interpretation services by end of FY20
- Implement plain language in NYCDOT's Essential Documents before translating them to the top 10 languages by FY23
- Conduct customer service language access usability surveys in three of the 10 designated citywide languages by end of FY22

**IV. Agency language access accomplishments and progress on goals from previous LAIP**

Goal	Update
<p><b><u>NYCDOT Licenses, Permits, and Registrations (LPRs):</u></b> Create website portal to LPRs translated into the City's top 10 languages.</p>	<p>NYCDOT met the July 2020 roll-out date and created equal access to all 51 LPRs for LEP customers. The new LPR portal also adheres to ADA graphic accessibility standards.</p>
<p><b><u>Language Access Database (LAD):</u></b> Enhanced LAD user experience with additional improvements to the technology, accessibility, layout, and submittal process. Future plans are underway to upgrade the use and technology of LAD.</p>	<p><b>LAD</b> was upgraded in February 2021 with a new user interface, improving accessibility to all aspects of the program. Submittal of translation and interpretation requests is streamlined.</p> <ul style="list-style-type: none"> <li>- CSLACU is conducting LAD training for NYCDOT Divisions.</li> </ul>
<p><b><u>Essential Documents (EDs):</u></b> Upgrade Most Commonly Distributed Documents (MCDs) which DOT refers to as Essential Documents (EDs) and eliminate obsolete documents.</p>	<ul style="list-style-type: none"> <li>- Created a tracking/maintenance database for Essential Documents in March 2020.</li> <li>- All new documents will be converted into plain language, as appropriate, post-Covid-19 hiatus.</li> </ul>
<p><b><u>Plain Language Initiatives:</u></b> CSLACU scrutinized work product of plain language consultant and consulted with operational units for whom documents were revised to plain language versions.</p>	<ul style="list-style-type: none"> <li>- NYCDOT eliminated costly Plain Language consultant contract in January 2019 and brought program in-house.</li> <li>- CSLACU created Plain Language version of PPPD Brochure.</li> <li>- In 2021, PPA is now rolling out a portal of plain language documents translated into the top 10 languages.</li> <li>- CSLACU will create plain language versions of additional Essential Documents, post-Covid-19 hiatus.</li> <li>- CSLACU is also researching various Plain Language websites and software developers to determine their effectiveness in expanding our toolbox.</li> </ul>
<p><b><u>Glossary of Commonly Used Transportation-related Terminology:</u></b> CSLACU is currently examining the efficacy of pursuing this program, as it has limited application at present. Budgetary restrictions under Covid-19 have placed non-essential programs on hiatus.</p>	<ul style="list-style-type: none"> <li>- CSLACU continues to maintain its existing glossary, which is currently available in Spanish, Traditional Chinese, and Russian.</li> <li>- Secondary review was conducted for each of the translated terms.</li> </ul>
<p><b><u>Literature Requests:</u></b> Eliminate distribution backlog.</p>	<ul style="list-style-type: none"> <li>- CSLACU eliminated the backlog of 3,500 Literature Requests and improved the turnaround time from 30 days to 2 days.</li> <li>- Literature requests are now being input into the Agency Response Tracking System (ARTS) to enable tracking and follow-up on returned envelopes.</li> </ul>
<p><b><u>Expand the Use of Verizon Message Boards:</u></b> Distribute the system throughout the boroughs.</p>	<p>CSLACU is working on expanding the use of the Verizon Message Boards with plans to install them at all NYCDOT Public Service Centers, once they reopen post Covid-19. This will create geographically and demographically targeted communications and increase the Agency's reach.</p>

## V. LEP population assessment

To properly assess translation/interpretation needs for LEP customers and to satisfy all compliance standards set forth by Local Law 30 and Executive Order 120, NYCDOT is guided by the **United States Department of Justice’s (DOJ) 4-Factor Analysis**.

### **Factor 1: The Number or Proportion of LEP Persons Eligible to be Served or Likely to be Encountered by the Program**

CSLACU has estimated the **number of LEP persons eligible to be served or likely to be encountered** based on the most recent published data from the 2018 United States Census Bureau/American Community Survey. The most common languages spoken and read by approximately 1.8 million LEP persons (those identified as “Speaking English less than very well”) in New York City are:

#	Language	Percent
1	Spanish	48
2	Chinese	18
3	Russian	6
4	Bengali	3
5	Haitian Creole	2
6	Korean	2
7	Arabic	2
8	Yiddish	2
9	French	1
10	Polish	1
11	Urdu	1
12	Italian	1

As of June 30, 2020, CSLACU completed translating NYCDOT’s most commonly distributed License, Permit, and Registration (LPR) applications and supporting documents (51 total) into the ten designated Citywide languages spoken and read in New York City, including Spanish, Chinese, Russian, Bengali, Arabic, Korean, Haitian Creole, Polish, Urdu, and French (for a total of 510 documents).

### **Factor 2: Frequency with which LEP Persons Come in Contact with the Program**

In addition to the population data provided by the American Community Survey and in accordance with Executive Order 120 and Local Law 30, NYCDOT measures its **frequency of contact with LEP persons** requiring LPR applications by calculating:

- The volume of LPR and other translation and interpretation requests in languages other than English,
- The volume of LPR application downloads/web hits from the NYCDOT website,
- The volume of translated literature requests,
- The volume of requests for telephonic interpretation/translations generated at one of NYCDOT’s eight Public Service Centers and through walk-in customers at various NYCDOT sites,
- The volume of in-person interpreters requested when NYCDOT is organizing or being represented at community events,
- The volume of translated inquiries and LPR forms submitted to NYCDOT for processing, and
- The volume of in-person submittals of translated documents and LPR forms at NYCDOT’s Public Service Centers.

Due to the COVID-19 pandemic, all of NYCDOT's Public Service Centers (PSCs) have been closed to the public since March 2020. Additionally, volumes of literature requests and telephonic interpretation requests from the public have been low. Although in-person meetings have mostly ceased, NYCDOT has held or participated in several events held via Zoom, where foreign language interpreters and translated materials have been requested based on the demographics of the neighborhood where the event is being "held". The vast majority of requests have been for Spanish or Chinese. During the Covid-19 pandemic, NYCDOT is conducting in-person distribution of flyers advertising Zoom Town Hall and outreach meetings. Intermittent Street Ambassador outreach to LEP merchants is also taking place. As such, NYCDOT will continue to provide translations of NYCDOT materials and telephonic interpretations in any language requested by our LEP customers.

**Factor 3: The Nature and Importance of the Program, Activity, or Service Provided by the Program to People's Lives**

NYCDOT provides LPRs and educational materials to members of the public, businesses, organizations, and large corporations. To evaluate the nature and importance of providing translated materials to people's lives, consideration must be given to the broad range of requests received: most importantly, applications for Parking Permits for People with Disabilities (PPPD) from New Yorkers (and their caregivers) who are in most need of parking access due to their severe mobility impairments. Other applications include permits to contractors who are completing vital street and sidewalk work and repairs (approximately 750,000 permits issued annually), intercity commuting matters, bridge access, and parking permits for clergy and not-for-profit organizations. Additionally, NYCDOT translates event-specific materials such as meeting flyers and PowerPoint presentations into languages based on the demographics of the neighborhood where the event is being "held" virtually, or physically. These translated materials provide access and opportunity for all New Yorkers to participate in community planning. Additionally, during the Covid-19 pandemic, on the NYCOT website and social media sites, we have initiated and updated translations, in the ten mandated languages, of all service changes, notices and Covid-19-specific programs, such as Open Streets and Open Restaurants.

**Factor 4: Resources Available to the Agency**

NYCDOT's newly reorganized CSLACU utilizes a toolbox of **available internal and external resources** to assist LEP persons in accessing translated LPR applications and other materials in any of the top ten languages. Citywide Language Bank Volunteers and bilingual DOT employees are also available to assist LEP individuals in completing translated documents, LPR applications, and in-person requests at one of NYCDOT's Public Service Centers. CSLACU staff also utilizes Language Line (an available translation service contracted by DCAS) to translate completed LPR applications and LEP NYCDOT requests into English for processing, which then undergo a secondary translation review for quality assurance and translation accuracy. CSLACU also works closely with DOT's IT & Telecom Division and Strategic Communications Unit to improve the efficiency of NYCDOT's public facing website, resource portals, and public graphic and digital communications. The increased volume of translations, due to frequent Covid-19-related service updates has strained our translation budget, but we have managed to retain the same level of service.

Using the foregoing analysis as a guide, NYCDOT will continue to provide all LPRs and essential documents in the ten designated citywide languages and continue to translate flyers, notices and other materials, depending on the reach of the materials and geographical area targeted. However, we will not proactively expand the number of languages provided for LPRs and essential documents at this time, due to budgetary constraints created by Covid-19.

## **VI. Provision of Language Access Services**

### **Translation**

NYCDOT continues to provide meaningful access to LEP customers, ensuring compliance with applicable Executive Orders and Local Law 30. Our translation vendor is Language Line Solutions, which provided over 500 document translations in 2020. LBVs have been used to provide short translations of phrases and dates or to review brief translations in very few instances. All LBVs have been certified and registered through the NYC Volunteer Language Bank.

Translation requests from NYCDOT staff are submitted through the Language Access Database (LAD), a proprietary database, created by Language Access for submission and processing of translation and interpretation requests. Translation requests from NYCDOT customers would typically be submitted via webform or in-person at one of our Public Service Centers (temporarily closed due to COVID-19 restrictions), then forwarded to Language Access staff for processing.

All translation requests are project managed by the Language Access Translation and In-Person Coordinator or other Language Access staff. All translation requests are processed and tracked through LAD. Translations fall into two basic categories: requests from operational units, typically event-specific flyers or materials, service updates and web content; or, Most Commonly Distributed (MCD) documents, which includes all License, Permits and Registrations as well as our most commonly distributed materials. Event-specific materials are generally translated into targeted languages, based on the demographics of a given neighborhood, whereas all Essential Documents are translated into a minimum of the ten languages designated by LL30. In 2020, NYCDOT translated all 51 LPRs into the ten designated languages and created a web portal on our website where LEP customers can access them, grouped by language or category. We also reviewed all essential documents, retiring several obsolete documents and reviewing all for plain language. To ensure that all essential documents are translated, we reach out to all operation units semi-annually to ascertain if any essential documents have been created, revised or retired. All new and revised documents are reviewed for plain language prior to translation.

Translated materials are distributed in several ways. In addition to the previously mentioned LPR Portal, translations of all Service Updates and information for all COVID-related programs, such as Open Restaurants, are conspicuously posted to our website in the ten designated languages. Event-specific flyers and neighborhood-specific notices are distributed electronically, often via partnership with sponsoring elected officials and community groups, as well as in-person, through outreach events or public postings. Targeted messages in languages other than English have also been posted to social media, through the NYCDOT's Twitter account.

Reviews of translations are provided by our vendor, GV Solutions (GVS). Translations of all essential documents are reviewed by GVS, as well as large translation projects, selected on a case-by-case basis. Additionally, native speaking staff from operational units requesting translations, often review them independently and advise Language Access staff of any discrepancies or preferential changes.

Staff are made aware of translation services and the request procedure through posting on our internal SharePoint page and periodic emails to all staff. Following a redesign of the translation and interpretation request process, an all-staff email was sent in January 2021, reminding staff of our Language Access policy and distributing Standard Operating Procedures for translation and interpretation requests. Additionally, a new LAD Training Manual has been created and is being distributed during training sessions, which commenced in February 2021. Training will be provided to members of each operational unit throughout the year.

### **Interpretation**

NYCDOT provides telephonic, in-person and virtual interpretation through our vendors, Language Line (through November 2020) and Voiance (telephonic) and Accurate Communications (in-person/virtual). Through Voiance, NYCDOT employees and customers have access to telephonic interpretation in over 100



languages. Accurate Communications provides in-person/virtual interpretation in over 20 spoken languages, ASL and Spanish Sign Language. Although Language Bank Volunteers are available and LBV lists are provided to all Public Service Center managers, almost all interpretation is done through our vendors.

Telephonic interpretations are typically initiated through NYCDOT's call-in numbers or at our Public Service Centers (which are temporarily closed due to Covid-19 restrictions). Unit managers initiate the call to Voiance so that interpretation can be provided. Once connected to Voiance, the LEP customer can state the language they need interpretation in. All in-person/virtual interpretation requests are project managed by the Language Access Translation and In-Person Coordinator or other Language Access staff. NYCDOT staff would determine which language(s) interpretation is/are needed, depending of the demographics of the subject neighborhood where the event is held. All in-person/virtual interpretation requests are processed and tracked through LAD. Due to COVID-19 almost all interpretation is currently being conducted virtually. Interpreters have been requested and provided for informational sessions, workshops, and community events, as well as internal employee meetings. Although outreach events have been limited, when they are held, an interpreter is always retained and typically accompanied by at least one bilingual staff member. The quality of interpretation services is evaluated and ensured through feedback, provided by attendees of NYCDOT events and bilingual staff who attend or monitor the events.

Similarly to translation, staff are made aware of interpretation services and the request procedure through posting on our internal SharePoint page and periodic emails to all staff. Following a redesign of the translation and Interpretation request process, an all-staff email was sent in January 2021, reminding staff of our Language Access policy, and distributing Standard Operating Procedures for translation and interpretation requests. Additionally, a new LAD Training Manual has been created and is being distributed during training sessions, which have commenced in February 2021. Training will be provided to members of each operational unit throughout the year.

### **Language Access in Agency Communications**

Translated materials are distributed in several ways. Aside from the previously mentioned LPR Portal, translations of all Service Updates and information for all COVID-related programs, such as Open Restaurants, are conspicuously posted to our website in the ten designated languages. Event-specific flyers and neighborhood-specific notices are distributed electronically, often via partnership with sponsoring elected officials and community groups, as well as in person, through outreach events or public postings. Targeted messages in languages other than English have also been posted to social media, through the Department's Twitter account.

### **Plain Language**

To ensure clear and effective communications, all essential documents are reviewed for plain language prior to translation and distribution. On a semi-annual basis, CSLACU contacts each operational unit to ascertain if any essential documents have been created, altered or retired. All documents submitted are reviewed and revised to align with plain language principles. To ensure that other translated materials, including flyers, informational materials and service updates, follow plain language principles, CSLACU is considering development of a training program or instructional materials, focused on plain language. Currently, Our Language Access SharePoint site provides a link to [PlainLanguage.gov](https://www.plainlanguage.gov), where useful tips for writing in plain language are provided.

### **Policies and Procedures**

NYCDOT's Language Access policies and procedures are stated through several SOPs, created by CSLACU. SOPs for use of LAD to submit translation and interpretation requests clearly state all procedures for submitting requests. SOPs developed for use by Public Service Center staff detail the process for identifying a customer's language through the use of "I speak..." posters, displayed at all PSCs, and procedures for using telephonic interpretation or requesting assistance from a Language Bank Volunteer. Distribution of materials and scheduling of training sessions for PSC staff are currently on hold until the PSCs reopen.

## **Notification of Free Interpretation Signage**

Notice of “Free Interpretation Services” is available to LEP customers via prominently displayed “I speak” posters, “Welcome” palm cards and “I Speak” cards at our PSCs. PSC staff have been instructed in the use of these materials to ascertain the language needs of LEP customers. Additionally, Voiance has provided tips for using telephonic interpretation, which are distributed to all PSCs. NYCDOT has acquired several electronic messaging boards, already in place at 55 Water Street in 2020, with plans to install them at all DOT Public Service Centers throughout every borough. Once Covid-19 restrictions are resolved, CSLACU will deploy the Verizon Message Boards that have already been designed for installation in 2020-21. This digital signage will create geographically and demographically targeted communications and increase the Agency’s reach. This will also afford LEP clients the ability to share their ideas with and provide feedback to NYCDOT.

## **Languages Beyond the Top Ten**

NYCDOT works to ensure that all New Yorkers have access to our services and pertinent information. As such, we are expanding the number of languages into which certain documents are translated. Currently, the Alternate Side Parking Calendar is published in 14 languages other than English, including the Top Ten as well as Italian, Greek, Yiddish and Simplified Chinese. A new NYCDOT Parking Permits Portal is currently being created for customers to register for, obtain and renew special parking permits. The entire portal is being translated into 11 languages, including Yiddish. CSLACU can also accommodate requests for translations in over 240 languages. A direct link to the Language Access email address is provided on the NYCDOT website. Any message received in a language other than English will be sent to LanguageLine for translation. Once translated, a response and any requested materials will be translated into the requestor’s preferred language by LanguageLine and then sent to the requestor. The NYCDOT website is currently accessible in any language through a “Google Translate” tab at the top of the page.

## **Emergency Preparedness and Response**

- **Accurate Communication will deploy multilingual and/or ASL interpreters, as required, to emergency sites designated by NYCDOT, in support of the NYPD, or the OEM.**
- **LanguageLine Translation Service (LLTS) provides rush translations to respond to emergency-related NYCDOT service changes, when required.**
- **Voiance is available 24/7 through any emergency site to provide telephonic multilingual interpretation in over 200 languages.**
- **The NYCDOT website is continually updated with translations of service changes, offering LEP customers access to multilingual digital information.**
- **NYCDOT’s Borough Commissioner Offices disseminate emergency and service updates through the use of community and ethnic media.**
- **NYCDOT also translates essential Twitter-feeds.**
- **Once Covid-19 restrictions lift and all public service centers (PSCs) reopen, demographically targeted digital timely announcements and emergency notifications will be continually updated.**

In the event of an emergency, NYCDOT’s Office of Emergency Response is responsible for adhering to a multi-agency communication protocol administered by NYPD. At all times, the Language Access Coordinator will respond to the agency’s needs to support the LEP community in times of crisis, in addition to day-to-day service.

CSLACU has developed an emergency interpretation plan that provides professional interpretation services at a specific site upon request from any DOT emergency personnel to ensure that language needs are addressed. An emergency site would be one designated by the NYCDOT, NYPD, or OEM. The plan also includes telephonic interpretation which can be arranged immediately 24 hours/day, 7 days/week with our consultant, Voiance. In addition, our translation vendor, LanguageLine has the ability to receive and produce expedited translations needed for distribution during an emergency. For broader, large-scale

emergency situations (citywide shutdown, hurricane, natural disasters, etc.), CSLACU will take direction from the City’s Office of Emergency Management and provide language services at any citywide site, as needed, to assist with disseminating NYCDOT-related information.

As a preventative safety measure, in an effort to better determine the language proficiency of DOT’s field workers and prepare a database of internal language needs, CSLACU produced a Work Zone Safety survey that was distributed on November 28, 2019 to field workers in the Sidewalk Inspection Management (SIM), Roadway Repair and Maintenance (RRM), and the Bridges Divisions. All of the surveys were returned by December 20, 2019. The purpose of this survey was to determine the need for Work Zone Safety training in additional languages. The survey asked three simple questions and provided 11 language choices and “Other”, as seen on the following page:

The image shows a survey form with an orange header and a white body. The header contains the text: "Thank you for taking the time to help us improve Work Zone Safety Training. Please take a moment to answer these questions." and the New York City DOT logo. The survey consists of three questions, each with a list of language options and an "Other" field.

**Thank you for taking the time to help us improve Work Zone Safety Training.**  
Please take a moment to answer these questions.

**NEW YORK CITY DOT**

**What language do you speak or understand most often?**

English  Spanish  Chinese (Mandarin)  Russian  Korean  Urdu  
 Bengali  Arabic  Haitian Creole  French  Polish  Other \_\_\_\_\_

**What language do you prefer to receive Work Zone Safety Training?**

English  Spanish  Chinese (Mandarin)  Russian  Korean  Urdu  
 Bengali  Arabic  Haitian Creole  French  Polish  Other \_\_\_\_\_

**In what language do you prefer to receive Work Zone Safety Training materials?**

English  Spanish  Chinese (Mandarin)  Russian  Korean  Urdu  
 Bengali  Arabic  Haitian Creole  French  Polish  Other \_\_\_\_\_

NYCDOT’s website landing page is directly linked to the NYC citywide DOHMC Covid-19 Portal and the translations available on that portal.

- Internally, Bilingual staff is available to interpret the protocols to LEP employees.
- Externally, CSLACU coordinates with IT and Strategic Communications to update NYCDOT’s landing page with all Covid-19 related NYCDOT service changes and translate updates into the top ten languages for NYCDOT’s LEP customers.
- Obtain telephonic interpretation to interpret DOT emergency updates, when requested.
- Worked with IT and Strategic Communications to redesign NYCDOT’s homepage and create a new landing portal for all LPR documents with universal icons to meet ADA compliant web standards and allow universal access to DOT emergency updates.

## VII. Training

The Language Access translation coordinator and interpretation coordinator provide training on their respective roles to NYCDOT operational units. Prior to the disruptions caused by the Covid-19 pandemic, we would provide in-person training for our NYCDOT operational units in order to reacquaint them with our duties and available language services. For our LPR rollout, we intended to conduct specialized training with each of the relevant units for processing. However, once the pandemic hit, we had to postpone our upcoming trainings to a future date.

As our Language Access Database had a user-interface update in mid-2020, it was important to provide training to the most frequent requesters of our multilingual services. Previously, our interpretation requests were processed through a fillable PDF form sent via email from the requesting Operational Units. Now, all interpretation requests are processed internally and recorded through LAD.

CSLACU scheduled webinar presentations for operational units (which were recorded) and walked through our new updates to the LAD application in real-time. A training session was held with NYCDOT's Training and Development Unit and we will continue training other operational units as needed in 2021. Currently, we are identifying NYCDOT groups based on frequency of usage. Additionally, once DOT's PSCs reopen, we will provide specialized training at each of our PSCs, which will include presentations for processing CSLACU's translated LPRs.

- NYCDOT operational managers who oversee NYC DOT's PSCs received links to Local Law 30 and were apprised of LL 30's LPR mandate.
- An agency-wide email was sent to all NYCDOT staff instructing them on how to use LAD's portal to easily access document translation and interpretation services. This same method was posted on NYCDOT's internal SharePoint. The new LAD deployment took place on February 25, 2021. At that time, CSLACU introduced Zoom training (due to Covid-19 restrictions) for the new LAD program. LAD training will be ongoing.
- The PSC personnel have been trained to provide LEP customers with three-way interpretation during the pandemic and dual phone lines connecting them to Voiance interpretation services when the PSCs reopen post Covid-19.
- NYCDOT Street Ambassadors coordinate with the in-person multilingual interpreters at their outreach events and introduce them to LEP customers and assist the customer in understanding the activity.
- NYCDOT Street Ambassadors work with the Accurate Communications in-person ASL interpreters at their outreach events and introduce them to customers requiring ASL assistance to understand the activity.
- In an effort to better determine the language proficiency of NYCDOT's field workers, CSLACU produced a Work Zone Safety survey that was distributed on November 28, 2019 to field workers in the Sidewalk Inspection Management (SIM), Roadway Repair and Maintenance (RRM), and the Bridges Divisions. All of the surveys were returned by December 20, 2019. The purpose of this survey was to determine the need for Work Zone Safety training in additional languages.
- Future training of operational managers is being planned for roll-out of the new NYCDOT LPR web portal.
- In compliance with LL 30, CSLACU is developing internal guidelines, SOPs and training procedures for NYCDOT staff, related to the introduction of LPR applications in languages other than English. A training session for all PSC employees and LBVs had been scheduled for April 3, 2020, but was postponed due to Covid-19 restrictions.
- The May 8, 2020, CSLACU LPR Orientation for PSC staff and LBVs, introducing LL 30 and the LPR mandate, a presentation on multilingual translation procedures, and utilizing the new LAD was postponed until February 25, 2021. At that time, CSLACU introduced Zoom training (due to Covid-19 restrictions) for the new LAD program which will be ongoing. Training will include how to serve LEP customers, provide and process LPRs, and encourage voter registration

- CSLACU will conduct on-site training and follow-up sessions, once Covid-19 restrictions lift, with all operational units impacted by the introduction of applications in languages other than English. These Units include: Parking Permits for People with Disabilities (PPPD), the Office of Construction Mitigation and Coordination (OCMC), Staten Island Ferry, the Division of Bridges, and Highway Inspection and Quality Assurance (HIQA). Staff in these Units will be trained with SOPs we are also developing for receiving non-English applications, utilizing LAD and requesting translation of the application information, so that it may be processed and the appropriate licenses, permits or registrations furnished to the customer.
- CSLACU will resume its routine visits to all public-facing offices and service centers, once Covid-19 restrictions allow reopening the PSCs. These visits will focus on training (with periodic inspections and personnel reviews) and supplying each center with documents in the ten languages required by LL 30.
- CSLACU updates the Language Bank Volunteer (LBV) List annually. An email was circulated on February 7, 2020 to all LBVs to verify their continuing participation. As part of Local Law 30's mandate, CSLACU has developed SOPs outlining best practices for NYCDOT's PSCs to process translated LPR forms received. As part of this customer service initiative, we are seeking LBVs for limited assistance (LBV schedules allowing) to the staff at our PSCs with the English translations of completed LPR forms that have been translated into one of the top ten languages. This does not require the LBVs to be on-site at the Public Service Center. CSLACU can use the call list that will be distributed to each of the eight PSCs. Once NYCDOT reopens the PSCs, CSLACU will provide training for both the LBVs and the Public Service Center staff on the seamless process for providing LEP customers with the most professional and efficient service.

### VIII. Record Keeping and Evaluation

- Designed and implemented an improved **Language Access Database (LAD) to track CSLACU's translation and interpretation projects**
- Produce monthly **Mayor's Management Report** data
- Produce **EEO/EDI Quarterly Updates on CSLACU's activities**
- Produce **Annual Title VI Report** for the FHWA
- Produce **MOIA's Annual Report on NYCDOT's Language Access Implementation**
- Produce **MOIA's Triennial NYCDOT Language Access Implementation Plan**

In addition to the population data provided by the American Community Survey and in accordance with Executive Order 120 and Local Law 30, **NYCDOT measures its frequency of contact with LEP persons** requiring applications by calculating:

- The volume of translation requests in languages other than English - 168
- The volume of application downloads/web hits from the NYCDOT website – N/A in 2020
- The volume of literature requests - 365
- The volume of requests for telephonic interpretation/translations generated at one of NYCDOT's eight Public Service Centers and through walk-in customers at various NYCDOT sites – N/A due to COVID-19 restrictions
- The volume of in-person interpreters requested when NYCDOT is organizing or being represented at community events
  - This number varies by community, depending on the number of separate LEP communities residing in a given Community Board: 57 requests, resulting in 122 interpreters being assigned in 2020
- The volume of translated LPR forms submitted to NYCDOT for processing – N/A: none through PSCs, ARTS, or LAD in 2020
- The volume of in-person submittals of translated LPR forms at NYCDOT's Public Service Centers – N/A: none through PSCs, ARTS, or LAD in 2020
- CSLACU is developing methods for surveying LEP customers that we have served.

## **Record keeping**

The vehicles/tools listed below all retain valuable data that will facilitate our review and evaluation of the demand for Language Access and how to further improve LEP connectivity to NYCDOT's outreach programs, LPRs, and commonly used documents:

- 311 tracks the volume of Literature Requests received
- NYCDOT's LAD portal tracks and generates reports quantifying the volume of:
  - Document Translation Requests through LanguageLine Solutions (LLS)
- Future development within the LAD system could generate reports quantifying the volume of:
  - Over-the-phone Interpretation Requests through LLS and Voiance
  - In-person Interpretation Requests are tracked through Accurate Communications
  - These are currently calculated and analyzed manually.
- In-person Interpretations were tracked in-house on an Excel spreadsheet during 2019 and 2020
- In-person Interpretations will be tracked by LAD in 2021.
- NYCDOT's Agency Resource Tracking System (ARTS) is capable of tracking language service, but was not utilized for this purpose during 2020, or 2021.

## **Evaluation**

- CSLACU Quality Assurance is conducted.
- LanguageLine provides three levels of translation reviews.
- GV Solutions provides additional secondary review services.
- CSLACU is in the process of developing methods for surveying LEP customers served. Deployment of surveys has been delayed due to Covid-19 temporary closures of PSCs.

## **IX. Resource analysis and planning**

CSLACU utilizes a toolbox of available internal and external resources for LEP persons to access translated documents in any language required, LPR applications in any of the top ten languages, and in-person and telephonic interpretations:

- **Internal Resources Utilized:**
  - CSLACU's new configuration is as follows:
    - Language Access Coordinator (LAC) evaluated 2020 Language Access services and processes used to assist LEP customers and developed streamlined operations. LAC has added and continues to implement process improvements. The LAC monitors CSLACU literature and voter registration material distribution. The LAC is also responsible for all analysis and language access reporting, both internally at NYCDOT and for external city, state, and federal reports. Ongoing analysis of new procedures will inform future actions, and a new
    - Community Coordinator is working with existing staff to implement operational improvements.
    - The Chinese bilingual Community Associate participated in NYCDOT's Leadership Academy, increasing his knowledge of DOT operations and improving his ability to communicate that information to LEP customers. Associate translated documents into Traditional and Simplified Chinese, provided Chinese interpretation at NYCDOT outreach events, and helped to create a glossary of commonly used transportation-related terminology in both Traditional and Simplified Chinese.

- The Community Associate coordinates and verifies the current list and participation of Language Bank Volunteers
- The Community Associate coordinates all requests for interpretation services and participates and monitors NYCDOT outreach event participation.
- Both the Community Coordinator and Community Associate submit ARTS requests and division/unit requests to LAD for translation services, multilingual and sign language interpretation.
- CSLACU's Graphic Artist develops Language Access posters, hand-outs, digital displays, and icons/logos/portals utilized on NYCDOT's website and SharePoint.
- One Computer Science Intern develops, upgrades, and maintains LAD, assists with the LPR portal, and conducts occasional Arabic-language reviews.
- NYCDOT and citywide Language Bank Volunteers have provided document translation services, in-person and telephonic interpretation services.
- **External Resources Utilized:**
  - Language Access staff also utilized the following external vendors:
    - **LanguageLine Translation Solutions (LLTS)**, currently provides document translation service under the DCAS translation contract.
    - **LanguageLine** provided telephonic interpretation through November 2020, under the DCAS telephonic interpretation contract.
    - **Voiance** currently provides telephonic interpretation service under the DCAS translation contract.
    - **Accurate Communication Services** provides both virtual and in-person multilingual and American Sign Language Interpretation services within NYCDOT operational units and at NYCDOT outreach events.
    - **GV Solutions** conducts secondary translation reviews for quality assurance and translation accuracy.

## X. Outreach and public awareness of language access services

CSLACU translates multilingual promotional materials for distribution at public events which will resume frequency post Covid-19. For example, pre-Covid-19, for NYCDOT's Freight Mobility Unit's "Truck's Eye View" public exhibit, CSLACU created multilingual poster boards to increase publicity and also printed palm cards to distribute to LEP attendees. When dispensing the palm cards, it provided a moment to open a dialogue with members of the public in their language and obtain feedback on how we can make language access even more accessible to the public. In conjunction with the Office of Freight Mobility's "Truck's Eye View" initiative, Language Access and its in-house Graphic Artist designed and printed promotional posters and palm cards to publicize five events for safety awareness. Two Spanish, and two Chinese (one Mandarin and one Cantonese) Interpreters were on hand at each of the events to explain trucksafety tips and to give New Yorkers a glimpse behind the driver's seat of a Department of Sanitation truck to see how obtrusive blind spots are when seated in the cab. After this, Language Access assisted by recording their trucking hotline in English, Spanish, and Mandarin for New York City truckers.

At NYCDOT's 2019 Summer Streets event (cancelled in 2020, due to Covid-19), we stocked each information table with pre-translated multilingual material to distribute to the public. When someone of the respective language approached a booth, a multilingual brochure package was assembled for them, in addition to flyers about job and internship opportunities with NYCDOT and Language Access. When approached by LEP customers, we could inform them in their language of preference about our mission and mandates. Additionally, we provided a survey to evaluate the multilingual assistance they received that day. Customers received CSLACU's contact information, should they have transportation-related inquiries arise in the future that we could assist with.

In 2019, there were 11 PSCs; however, due to ongoing construction at the Queens PSCs, there are currently eight PSCs which will reopen post Covid-19. The PSCs are routinely serviced to maintain signage offering free language services, when not closed due to Covid-19. The Mayor's Office of Immigrant Affairs' poster alerting LEP customers of their right to access interpreters in their native language was posted in all of our PSCs, together with a poster designed by DOT with a similar message. The PSC managers are also trained to offer the telephonic translation services to any customer requiring multilingual interpretation and translation assistance. Progress was made to coordinate media production and community LEP outreach efforts, as evidenced by the publications distributed and listed on the following pages:

### 1. Publications

- Postcards (4 Postcards; various language translations, see context below):
  - "Get There Without a Ticket" postcard - word flow corrections incorporating (Spanish & Chinese) translations. Prepared final document for print.
  - "Free Interpretation Available, We're Here to Help" postcard - formatted three translations (Spanish, Chinese & Russian) Prepared final document for print.
  - Vision Zero "Jamaica Avenue" postcards transcribed Punjabi into layout, editing to accommodate word flow, provided native file package created final for print.
  - "Welcome/Free Interpretation Cards" to be distributed to 11 Public Service Centers. Designed 11 PSC Cards containing 10 languages (English, Spanish, Russian, Chinese, Korean, Haitian Creole, Italian, Bengali, Arabic and Polish) for LanguageLine translation. **Total: 110 cards (originals) - usually 500 copies are printed.**
- Flyers (3 Flyers; various language translations, see context below):
  - "Car- Free Earth Day"  
Transcribed Spanish translation into flyer's layout; altered design to accommodate translated text overflow. Prepared final document for print.
  - "Parking Regulations - Info on Website/Sign Legend" flyer designed for Permits & Customer Service's Public Service Center at 30-30 Thomson Ave. (English)  
Prepared final document for print.



- “WalkBus Pilot Program for Parents” flyer for Safety Education - transcribed into four languages: (English, Spanish, Arabic & Traditional Chinese); revised design/edited images to incorporate text overflow
  - **Brochure (1 brochure; awaiting approval will be printed in 11 languages):**  
Designed “Parking for People with Disabilities (PPPD)” brochure (new look) for revised textural content. (Project in progress)
- 2. Posters/Postcards - Community Outreach Events**  
(5 Posters; 1 Postcard; 1 Identity Card: various language translations):
- “Truck’s Eye View”: Designed poster “Free Interpretation Available, We’re here to help” for community event. Formatted/transcribed three translations: (English, Spanish, Chinese & Russian)
  - “NYC Cycling”: Bike Outreach Poster - reformatted layout to improve text legibility in (Spanish, Chinese and English)
  - “Under the L” Sunset Park event:
    - Designed postcards “Free Interpretation” (English, Spanish & Chinese)
    - Designed one poster “Free Interpretation” (English, Spanish & Chinese)
    - Designed NYC DOT identity cards (DOT logo & LA logo) to fit inside “interpreter’s vest sleeves”
  - “Summer Streets”:  
Designed “Free Interpretation” posters (24x36)  
(English, Spanish & Chinese on each board)
  - “Bike Helmet Fitting”:  
Designed “Free Interpretation” posters (24x36)  
(English, Spanish & Chinese on each board)
- 3. Digital Signage – Public Service Center (PSC) at 55 Water St**  
(4 digital signs; various language translations, see context below)
- Language Access updated, designed, and reformatted digital informational and campaign digital signage for the PSC at 55 Water Street.
  - Language Access designed Customer Holiday Notification digital signs: New Year’s Day, Martin Luther King Junior Day, Presidents’ Day, Independence Day, Labor Day, Columbus Day, Election Day, Veterans Day, Thanksgiving Day, and Christmas Day
  - For easy readability Language Access designed business hours digital signs for all PSCs and Borough Commissioner Offices based upon plain language/accessibility criteria - (digital signs will be available in these offices in the near future, awaiting Verizon Digital Signage technology approval)
  - Language Access designed “Free Interpretation” digital signs: English, Spanish, Chinese and Russian.
  - Additional digital signs were added for Business Hours, Register to Vote, Work Zone Awareness and “Summer Streets” (featured event) for the display loop
  - Additional “Left Turns are Dangerous” digital signs were added for the display loop
  - Language Access reformatted Vision Zero “Left Turns are Dangerous” campaign for digital signage

Since the onset of the Covid-19 pandemic, much of the physical NYCOT outreach has had to adapt to providing virtual translation and interpretation, both multilingual and sign language, to support all DOT outreach activities and internal NYCDOT meetings. Language Access staff actively participated at Public Hearings and Community Board Meetings. Various Community Boards do publicize NYCDOT outreach events to LEP communities through placement of advertisements in local newspapers published in languages other than English. Prior to comprehensively translating the LPRs into the ten mandated languages, which has been in full compliance since July 1, 2020.

Digital outreach includes CSLACU providing expedited translations of all Covid-19 related DOT service updates and Mayoral initiatives such as Open Streets and Open Restaurants. All translations (in the top 10

languages) have been uploaded to the NYCDOT website to keep the LEP community informed and help all customers keep their businesses and personal lives up and running.

In 2020, Language Access received the most interpretation requests (57 in 2020 vs. 56 in 2019) and assigned 122 interpreters (vs a record-setting 189 in 2019). This is due to the increased involvement of Language Access in facilitating events planned by NYCDOT operational units, which has created a strong rapport between Language Access, NYCDOT's internal groups, our DCAS-contracted interpreters, and the Limited English Proficient (LEP) public. The lower number of assigned interpreters is attributable to the limitations created by Covid-19. Providing multilingual interpretation at Zoom meetings requires fewer multilingual interpreters, as multiple interpreters are not needed to cover large geographic areas serving many LEP customers, as they did at outreach events such as Summer Streets pre-Covid-19.

It is NYCDOT's policy to advertise the availability of multilingual and ASL interpretation for all virtual and actual meetings. CSLACU has improved the technological capabilities of its LAD system for requesting these services and is training NYCDOT's employees in its use. For the Black History Month: "New Faces in New Mobility" panel held for NYCDOT employees, Language Access provided two American Sign Language (ASL) interpreters to interpret the lecture for requesting attendees. In the first half of the 2019, Language Access aided NYCDOT's Urban Design+Art+Wayfinding unit in a public survey to assess the accessibility of the WalkNYC signage posted citywide. Language Access translated the survey and provided interpreters to conduct the multilingual surveys in the following languages on five different deployments: Spanish (two at each date), Chinese (one Mandarin and Cantonese at each date), Russian (one at the Brighton Beach date), Ukrainian (one at Brighton Beach date), Korean (one at the Queensboro Plaza date), and Haitian Creole (two at the Grand Concourse date). Surveys were conducted on the sidewalks of hubs in Queen's Queensboro Plaza and Flushing, Bronx's Grand Concourse, Brooklyn's Brighton Beach, and Manhattan's Chinatown.

In July 2019, Language Access was asked by NYCDOT's Design+Art+Wayfinding unit to provide interpretation at Manhattan's Community Board 3 meeting regarding their upcoming "Gateways to Chinatown" installation to be constructed in the heart of Chinatown. Language Access provided one Spanish, one Mandarin, and one Cantonese interpreter to answer questions from the public about the design and origin of the art project.

Before NYCDOT's annual 2019 Summer Streets festival (in which Park Avenue is closed to car traffic and turned into a pedestrian and biking route), NYCDOT's Urban Design+Art+Wayfinding unit, Regional & Strategic Planning subdivision, and the Office of Freight Mobility reached out to Language Access to provide interpretation at six separate Park Avenue rest stops on the first three Saturdays in August. For all three dates, Language Access provided ASL, Spanish, Chinese (Mandarin and Cantonese), and French interpreters to staff informational booths at the event. The in-house Graphic Artist from Language Access created five multilingual posters with ASL, Spanish, and Chinese promotion to display at each of the interpretational rest stops.

In the fall of 2019, for the first time in the Unit's history, Language Access participated in DOT's Free Bike Helmet Fitting event, which occurs August through October annually. Members of Language Access, as well as Spanish (two at each date), Chinese (one Mandarin and Cantonese at each date), Russian (one date), and Arabic (one date) interpreters were trained to safely fit and distribute free bike helmets for the public. The unit attended 11 bike helmet fittings over the two months to fit and give away over 20,000 bike helmets to New Yorkers, regardless of which language they speak.

The final events of 2019 (pre-Covid-19) that Language Access took part in were merchant surveys in Sunset Park conducted by NYCDOT's Street Ambassadors. The aim of the study was to ascertain the need for alleviated delivery traffic outside the businesses 8<sup>th</sup> Avenue commerce hub. As the majority of business owners spoke at least one of many dialects of Chinese, Language Access attended the three deployments in the fourth quarter, and assisted by supplying two Mandarin, one Cantonese, one Cantonese and Fujianese, and one Mandarin-speaking member of Language Access. During Covid-19, Language Access worked with

the Street Ambassadors, all outfitted with appropriate PPE and utilizing social distancing, on their deployments in October 2020 to conduct surveys of the Jamaica Business Improvement District.

## **XI. Language Access complaints**

The public can submit complaints or concerns either through the “Contact the Commissioner” link on the NYCOT external website or by calling 311 or visiting 311 online. DOT has an established procedure for handling customer complaints. Customer complaints are routed through 311 system, into NYCDOT’s Agency Response Tracking system (ARTS) for final routing to the CSLACU mailbox “languageaccess@dot.nyc.gov.” CSLACU is responsible for reviewing, handling and responding to language access complaints.

During Language Access Policy and Procedure training (occurring post-Covid-19), NYCDOT managers, supervisors and front-line staff are informed of agency procedure for processing language access complaints, questions and requests. Additionally, to ensure that managers, supervisors and front-line staff are aware of the agency procedure, CSLACU installs and maintains signage in NYCDOT’s public service centers (PSCs) that informs customers (in the designated 10 citywide languages, plus English) of their rights to complain, question and request services. Customers are informed to call 3-1-1 or speak to a NYCDOT manager or supervisor.

The required timeframe for NYCDOT Language Access to acknowledge and/or respond to customer complaints, questions or requests is no longer than 14 days. CSLACU plans to post this established agency procedure for handling customer questions, complaints and requests on the CSLACU SharePoint pages.

The public can submit complaints or concerns, either through the “Contact the Commissioner” link on the NYCDOT external website or by calling 311 or visiting 311on-line.

Language Access/DOT did not receive any complaints from LEP customers through 311, LAD, ARTS, or through the external and internal NYCDOT websites.

NYCDOT’s previous Language Access Unit, now CSLACU, received two recommendations from the Mayor’s Office of Operation (MOO) Secret Shopper program on July 18, 2019. At our PSCs at 55 Water Street in Manhattan and 16 Court Street in Brooklyn, the DOT staffers were unable to direct the LEP/Secret Shoppers to the dual set phone to telephone Language Line for translation services, despite clear signage indicating the availability of LEP services. Once all of the Public Service Centers (PSCs) reopen, post pandemic, the PSC liaisons will receive comprehensive retraining on the array of language services available. LPR training will be included, as well.

Language Access/NYCDOT did not receive any complaints from LEP customers through 311, LAD, ARTS, or through the external and internal NYCDOT websites.

NYCDOT’s previous Language Access Unit, now CSLACU, received two recommendations from the Mayor’s Office of Operation (MOO) Secret Shopper program on July 18, 2019. At our Public Service Centers (PSCs) at 55 Water Street in Manhattan and 16 Court Street in Brooklyn, the NYCDOT staffers were unable to direct the LEP/Secret Shoppers to the dual set phone to telephone Language Line for translation services, despite clear signage indicating the availability of LEP services. All of the Public Service Center liaisons will receive comprehensive retraining on the array of language services available. LPR training will be included, as well. The MOO Secret Shoppers were the only external source of people any Language Access complaints during 2019.

## **XII. Implementation plan logistics**

**CSLACU will continue to implement its current and future goals by creating ongoing:**

- **NYCDOT compliance with LL30 and MOIA guidelines**
- **Updates to the LPR landing page with dedicated icons on the NYCDOT website**
- **New programs, program updates, and service updates translated into the top ten languages:**
  - **Rapid deployment of Covid-19 Alerts to NYCDOT service modifications**
  - **Open Streets and Open Boulevards: ongoing program updates**
  - **Open Restaurant: continuous applications introduced through DOT homepage online link. New restaurants are applying and all restaurants must renew their current applications every year.**
  - **Current and future Social Media Alerts delivered to the public**
  - **Current and future Mayoral Initiatives**
- **Direct access to translation and interpretation services for agency operational managers and LEP customers**
- **Direct document access for the public, including translated information**
- **Opportunities and methods for the public to share their ideas with and provide feedback to NYCDOT**

Language Access Goal	Milestones	Deadline	Staff Responsible
<p><b><u>NYCDOT Licenses, Permits, and Registrations (LPRs) :</u></b> Create and update website portal to LPRs translated into the City's top 10 languages</p>	<p>NYCDOT met the July 2020 roll-out date and created equal access to all 51 LPRs for LEP customers. The new LPR portal also adheres to ADA graphic accessibility standards. New LPRs will be added as they are created or existing LPRs are revised.</p>	<p><b>July 1, 2020 and will update as new DOT LPRs are added.</b>  <b>Ongoing updates.</b></p>	<p><b>CSLACU, IT&amp;T, and Strategic Communications</b></p>
<p><b><u>Language Access Database (LAD):</u></b> Enhanced LAD user experience with additional improvements to the technology, accessibility, layout, and submittal process. <b>Future plans are underway to upgrade the use and technology of LAD.</b></p>	<p>LAD was upgraded with a new user interface, improving accessibility to all aspects of the program. - Submittal of translation and interpretation requests is streamlined. - <b>CSLACU is conducting LAD training for NYCDOT divisions.</b></p>	<p><b>February 2021 and</b>  <b>Provide continuous updates as DOT needs arise at Ops Units.</b></p>	<p><b>CSLACU and IT&amp;T</b></p>
<p><b><u>Essential Documents (EDs)/ Most Commonly Distributed Documents (MCDs):</u></b> Continuously upgrade Essential Documents and eliminate obsolete documents</p>	<p>- Maintain new tracking database for EDs/MCDs. - <b>Update List of EDs biannually</b> - <b>All new documents will be converted into plain language, as appropriate, post-Covid-19 hiatus.</b></p>	<p><b>Ongoing</b>  <b>Twice Yearly</b> <b>Ongoing</b></p>	<p><b>CSLACU</b>  <b>CSLACU and NYCDOT</b> <b>CSLACU</b></p>
<p><b><u>Plain Language Initiatives:</u></b> CSLACU scrutinized work product of plain language consultant and consulted with operational units for whom documents were revised to plain language versions.  <b>CSLACU is developing a program to educate and train DOT's Planning and Operational Managers to identify existing and upcoming documents for wide distribution and assist them in converting them to Plain Language before translating them into the top ten languages.</b></p>	<p>-<b>NYCDOT</b> eliminated costly Plain Language consultant contract and brought this program in-house. - CSLACU creating new Plain Language version of PPPD Brochure. - <b>In 2021, PPA will roll out a portal of plain language documents translated into the top 10 languages.</b> - <b>CSLACU will create plain language versions of additional Essential Documents, post-Covid-19 hiatus.</b> - <b>CSLACU is also researching various Plain Language websites and software developers to determine their effectiveness in expanding our toolbox.</b></p>	<p><b>January 2019</b> <b>Ongoing in-house implementation.</b>  <b>Fall 2021</b>  <b>Fall 2021</b>  <b>Ongoing</b>  <b>Ongoing</b></p>	<p><b>CSLACU</b>  <b>CSLACU</b>  <b>PPA, CSLACU, IT&amp;T</b>  <b>CSLACU</b>  <b>CSLACU</b></p>
<p><b><u>Glossary of Commonly Used Transportation-related Terminology:</u></b> CSLACU is currently examining the efficacy of pursuing this program, as it has limited application at present. <b>Budgetary restrictions under Covid-19 have placed non-essential programs on hiatus.</b></p>	<p>- CSLACU continues to maintain its existing glossary which is currently available in Spanish, Traditional Chinese, and Russian. - Secondary review was conducted for each of the translated terms and will continue as glossary grows.</p>	<p><b>Ongoing</b>      <b>2019 and Ongoing</b></p>	<p><b>CSLACU</b>      <b>Leticia Molinero, Now GV Solutions and LLTS</b></p>

<p><b>Literature Requests:</b>  <b>Continue to eliminate</b> distribution backlog. <b>Identify ED/ MCDs most needed in translation and translate them,</b></p>	<p>- CSLACU eliminated the backlog of 3,500 Literature Requests and improved the turnaround time from 30 days to 2 days.  - Literature requests are now being input into the Agency Response Tracking System (ARTS) to enable tracking and follow-up on returned envelopes.</p>	<p><b>November 2019 and Ongoing</b>   Ongoing</p>	<p>CSLACU   CSLACU</p>
<p><b>Language Access Goal</b></p>	<p><b>Milestones</b></p>	<p><b>Deadline</b></p>	<p><b>Staff Responsible</b></p>
<p><b>Expand the Use of Verizon Message Boards:</b>  Distribute the system throughout the boroughs, post pandemic.</p>	<p>CSLACU is working on expanding the use of the Verizon Message Boards with plans to install them at all NYCDOT Public Service Centers, once they reopen post Covid-19. This will create geographically and demographically targeted communications and increase the Agency's reach.</p>	<p>Installation of Message Boards will resume post-Covid-19.   Ongoing updates.</p>	<p>CSLACU Graphic Designer and IT&amp;T</p>
<p><b>Incorporate ADA Standards in DOT Communications</b></p>	<ul style="list-style-type: none"> <li>• Train DOT CSLACU staff</li> <li>• Incorporate ADA standards into <ul style="list-style-type: none"> <li>- Written Communications</li> <li>- Virtual and Actual Presentations</li> <li>- Digital Content</li> </ul> </li> </ul>	<p>Ongoing</p>	<p>DOT Creative Services, CSLACU Graphic Designer, and CSLACU Staff</p>
<p><b>Improve Language Access Contracts</b></p>	<ul style="list-style-type: none"> <li>• Participation in MOIA's RFP panel to assist DCAS in creating a more comprehensive scope of work for the City translation and interpretation service contracts will resume, once Covid-19 LEP initiative is completed</li> <li>• Solicit new vendors, expanding our M/WBE outreach</li> <li>• Created new cost-sharing and cost containment guidelines for NYCDOT. SOPs are ready to deploy for <ul style="list-style-type: none"> <li>- Document Translation</li> <li>- Interpretation</li> </ul> </li> <li>• Hold contractors accountable: <ul style="list-style-type: none"> <li>- Clarify Language Access requirements</li> <li>- Supervise and follow-up with contractor's work product</li> <li>- Higher level of NYCDOT oversight and scrutiny of invoices</li> </ul> </li> </ul>	<p>Post Covid-19   Ongoing   February 2021, Implementation ongoing   Ongoing</p>	<p>CSLACU, MOIA, and Other City Agencies   CSLACU   CSLACU   CSLACU</p>