

NYC DOT Language Access Implementation Plan

Name and title of Language Access Coordinator:

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I. Agency Mission and Background

DOT's 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. Our agency's work is guided by Sustainable Streets, the Strategic Plan for the New York City Department of Transportation. We are 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 4,500 DOT employees oversee one of the most complex urban transportation networks in the world. DOT's staff manage an annual operating budget of \$900 million and a five-year \$6.3 billion capital program, 6,000 miles of streets and highways, over 12,000 miles of sidewalk, 789 bridge and tunnels. DOT's staff installs and maintains over one million street signs, 12,700 signalized intersections, over 315,000 street lights, and 69 million linear feet of markings.

DOT promotes the use of sustainable modes of transportation. DOT designs bicycle facilities, bus lanes, and public plazas. DOT operates the Staten Island Ferry, which serves over 22 million people annually and oversees ferry operations on City-owned piers. DOT educates students and adults Citywide about street safety. DOT'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.

DOT 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, DOT 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 DOT's efforts, conducted throughout the five boroughs by multiple DOT Divisions, Units and Offices to maintain, develop and promote numerous transportation initiatives, including but not limited to:

- Safe bicycling
- Wayfinding and safe pedestrian crossings
- Traffic calming and other safety improvements
- Alternative modes of transportation

DOT continues in its robust outreach efforts engaging LEP communities through the provision of agency language services in various communication channels, such as face to face in meetings, on-line through emails, social media and mixed mode surveys. DOT invites customer feedback and participation in agency campaigns and the development of various projects such as Vision Zero; DWI; Safety Education; Transit Development; Bridge Construction; Truck Traffic; Bike Share; Public Plazas; and Parking Regulations.

One of DOT's formation and implementation of the DOT Street Ambassador program is a recent innovative strategies that was instituted for the purpose of expanding agency outreach and ensuring public engagement in communities citywide. Customer driven in all their activities, DOT Street Ambassadors meet members of the public in their neighborhoods engaging New Yorkers in the planning and development of DOT projects aimed at safety, mobility, sustainability and quality of life. DOT 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. DOT's goal is to move the City closer toward an inclusive and just planning process. Since Street Ambassadors are strategically deployed to busy areas near project sites, they hear directly from the people. New Yorkers have opportunities to stop and chat about a project on their own time and in their own language.

DOT Customer Service/Language Access Unit (CSLA) provides a full-range of professional language services designed for all customers in a various scenarios: one-on-one customer communications; group settings; email and letter responses; fulfillment of customer literature requests; distribution of: Voter Registration forms in multiple languages; distribution of DOT translated materials as well as the installation and updates to translated DOT signage. As a supplement to agency language services in which certified interpreters and translators are provided, DOT utilizes DOT bilingual employees to provide language services on a volunteer basis. Bilingual employees provide interpretations in one-on one communications with LEPs and they also review brief translation projects prior to distribution.

DOT hosts special events to all members of the public where both interpretation and translation services are arranged in partnership with many agencies and community organizations, to name only a few: 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.

Other widespread points of customer contacts continue to occur at DOT's Public Service Centers located citywide where members of the public arrive in-person to engage in transactions or get information related to core City 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; Environmental Control Board summonses; Disability, Clergy and other permit types. At these Public Service Centers, customers can also request meetings and reviews with the DOT Office of Construction Mitigation Coordination. By ensuring the development and provision of Citywide Mayoral initiatives in both customer service and language access, CSLA provides the critical link for LEP clients to communicate with DOT in multiple languages and receive a variety of services. CSLA is directly responsible for providing and overseeing customer service language programming in 9 DOT Public Service Centers. 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.

II. Agency Language Access Policy and Goals

Purpose

DOT Customer Service Language Access (CSLA) provides language services free of charge to customers citywide, ensuring meaningful access for LEP customers in agency programs and activities. To properly serve the rich diversity of language and transportation needs of New Yorkers, DOT must employ inclusive, innovative and systematic approaches aimed at developing and implementing customer service language access best practices. DOT communicates with LEPs in both written and spoken languages enabling them to interact and actively participate in government project planning, safety and other vital City transportation initiatives. CSLA maintains its leadership role in program development and implementation designed to provide quality language services and ensure customer readability in all languages, including English. These agency efforts support Mayor Bill de Blasio's initiatives to promote equity, diversity, as well as economic and civic engagement.

DOT's CSLA policy addresses the needs and interests of numerous language stakeholders: foremost, members of the public including LEP customers; the Mayor's Office of Immigrant Affairs; the Mayor's Office of Operations; Elective Officials; DOT Executive, managerial, supervisory and front-line staff from a diversity of divisions and units agency-wide; DOT Customer Service Language Access; the Commissioner's Correspondence Unit – CCU; DOT Strategic Communications; DOT Press; DOT Human Resources and Facilities Management; DOT Legal; DOT Public Service Centers; DOT Creative Services; DOT Street Ambassadors; DOT IT and Telecom; and other participating DOT Divisions/Units; Language Service Providers that provide Certified translators and interpreters through contracts with vendors; Citywide Language Bank Volunteers; Bilingual DOT staff; Transportation Agency partners, in the US and abroad; college and university partners in the US and abroad; DOT CSLA's inter-agency and organizational partners.

Customer Service Language Access Policies are established to ensure compliance with Local Law 30 (LL30) building upon CSLA accomplishments achieved in its first 10 years "2008-2018" since Mayoral Executive Orders 115 and 120 were issued.

- Continue to provide centralized agency-wide language translation and interpretation services utilized in various channels of agency communications;
- Continue to train DOT employees and new hires in customer service language access policies and procedures on when and how to provide language services;
- Continue to update, maintain and improve customer service language access signage posted in DOT's public service centers and 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 increase demand for such services;
- Continue to upgrade DOT's Language Access Databases 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.

Customer Service Language Access Goals

- Adopt state-of-the-art technology by end of FY19 to streamline content for greater efficiency, quality and consistency in projects requiring translation and/or interpretation;
- Design, translate, produce and install Customer Service Language Access signage in the 10 designated citywide languages by end of FY19;
- Upgrade DOT's customer service/language access request portal to facilitate a one stop shop experience for DOT project managers to request both translation and interpretation services by end of FY20;
- Provide "DOT Language Academy Certification" in three of the 10 designated citywide languages by end of FY22. By end of FY19, DOT will establish a Spanish language assessment tool and learning resources for Spanish bilingual employees who volunteer to review translations;
- Conduct a linguistic assessment in three of the 10 designated citywide languages by end of FY22. By the end of FY19, DOT will conduct a linguistic assessment of transportation Spanish vocabularies from DOT's translation library and from other transportation translation library resources to identify the range of vocabulary commonly used in transportation;
- Conduct customer service language access usability surveys in three of the 10 designated citywide languages by end of FY22. By end of FY19, DOT will conduct a language access usability survey in Spanish to determine the register most widely understood by LEP customers;
- Pending budget approval, hire staffing resources qualified in professional translation and interpretation services as well as in project management to expand and monitor implementation of DOT's language access plan by end of FY20.

III. LEP Population Assessment

1. Languages Covered

CSLA will continue to translate most commonly distributed¹ documents into a minimum of ten languages (Spanish, Chinese, Russian, Haitian Creole, Korean, French, Polish, Bengali, Arabic and Urdu), as required by Local Law 30 and Executive Order No. 120. DOT determines such documents through:

- The number of customer "hits" or "downloads" of these documents available on the DOT website;
- The number of customer requests for DOT literature shown in Siebel, 311's customer relations management system;
- When agency documents are updates or new documents are introduced, CSLA consults with senior staff and other Language Access stakeholders to determine updates to agency Essential documents.

DOT will provide interpretation services in all available languages, including, but not limited to: Spanish, Chinese, Russian, Haitian Creole, Korean, French, Polish, Bengali, Arabic and Urdu through Language Service providers with whom DOT has contracted.

¹ Internally referred as "Essential Documents"

2. DOJ 4-Factor Analysis

To properly assess LEP language access needs and to satisfy all compliance standards set forth in Local Law 30 and Executive Order 120, the Department is guided by the United States Department of Justice (DOJ) 4-Factor Analysis.

a) Factor 1 – LEP population served or encountered

Since 2015, DOT has noted four additional languages published by US Census Bureau and the 2015 American Community Survey: Yiddish, Polish, Urdu, and French.

The most common languages spoken and read by approximately 1.8 million LEP persons in New York City are²:

Language	Percent
Spanish	48.4
Chinese	17.9
Russian	6.1
Bengali	3.1
Haitian Creole	2.7
Korean	2.5
Arabic	1.6
Yiddish	1.5
Italian	1.5
Polish	1.4
Urdu	1.2
French	1.1

DOT has begun translating its most commonly distributed documents into the required Local Law 30 languages. As of the date of this report, nine documents have been translated into LL30 languages in addition to Italian. By end of FY19 when these documents are updated and revised, DOT will include Yiddish in the next batch of Essential Documents translations, as suggested by the chart above.

b) Factor 2 – Frequency of contact with LEP customers

In addition to population data provided by the Census, the 2015 American Community Survey Public; Executive 120 and the ten (10) designated citywide languages, CSLA will be guided in its decisions with respect to language access services by its measurable contact with the LEP community.

Contact is measured through DOT's record keeping of: translations; in-person and over-the-phone interpretation services; 311 customer literature requests; agency customer intake online forms and web hits.

- Translations

CSLA monitors the number and types of language translations distributed to LEPs using DOT's Language Access Database (LAD). Project managers and CSLA staff upload source materials for translation, indicating the number and language type(s) for each translation request. LAD generates reports that show the number of source documents and associated translations sorted by language. For any given date range, CSLA administra-

² U.S. Census Bureau, 2015 American Community Survey Public Use Microdata 1-Year Sample Population Division – New York City Department of City Planning (February 2017)

tors determine the number of translations produced and the number of requested languages. Additional information, such as project location, nature of LEP interaction and distribution method is also accessible through LAD. For example, in January – December 2017, CSLA fulfilled a total of 116 translation requests producing 298 translations in 19 languages, the top three of which are Spanish, Chinese, and Russian. Please see below.

2017 Document Translations		
Language	# of Translations	Percent
Spanish	83	27.9%
Chinese	46	15.4%
Russian	27	9.1%
Bengali	22	7.4%
Arabic	19	6.4%
Korean	18	6.0%
Haitian Creole	17	5.7%
French	15	5.0%
Polish	14	4.7%
Italian	10	3.4%
Urdu	9	3.0%
Greek	7	2.4%
Hindi	3	1.0%
English	2	0.7%
Yiddish	2	0.7%
Hebrew	1	0.3%
Nepali	1	0.3%
Punjabi	1	0.3%
Tibetan	1	0.3%
Total # of Translations	298	100%

- Interpretations

With respect to interpretation services, DOT has established a record keeping system that allows for monitoring the frequency of LEP customer contact through over-the-phone interpretation and in-person interpretation service details. The system shows various details for over-the-phone interpretation services and for in-person interpretation services: requested languages; call length in minutes, call volume per month; name of DOT Division requesting the service; duration of in-person interpretation service with description of event and DOT on-site contact information.

Annual demand for in-person interpretation services has grown dramatically in recent years, from 9 requests in 2015 to 49 in 2017. The total number of minutes LEO customers spent with professional phone interpreters has also significantly increased: in 2010 it was 7,974 minutes, whereas in 2017, it has more than tripled to 20,595 minutes.

- 311 Literature Requests

CSLA tracks customer requests for literature in English and in multiple languages. DOT has created service requests for customers who request information related to Alternated Side Parking regulations, Staten Island Ferry Schedule, City and State Parking Permit applications for People with Disabilities, Bike Smart Brochures and more. CSLA fulfills customer literature requests by mailing hard copies of these documents available in English and in multiple languages.

- Online Web Forms

Customers write to the DOT Commissioner or the Borough Commissioner using agency translated “online web forms.” These drop-down menus provide LEP customers an easy way to communicate their concerns, requests, or comments. Customer communications received through this channel on the DOT website can be sorted by language, tracked and monitored. Web form drop-down menus are currently available in 9 languages, including English. CSLA plans to translate the drop-down menus into additional languages to comply with 10-language Local Law requirement.

- Web Hits

Customers access materials in languages other than English on the DOT website; for example, the DOT mission statement is available in multiple languages and customers may access web pages containing links to other translations. DOT easily tracks the most visited pages overall where customers obtain information, for example, regarding alternate side parking, parking permits for people with disabilities and bicyclist safety. In 2016, members of the public visited 1,000 links on DOT’s website, resulting in 360,049 separate visits, which includes links in languages other than English. Forty-nine (49) links in languages other than English generated 97,737 of the 360,049 visits.

c) Factor 3 – The nature and importance of the program, activity or service

DOT provides transportation services to members of the public that address social, economic, safety, environmental and quality of life needs. DOT fosters dialogue with individuals and communities throughout NYC while responding to public concerns, comments, questions and/or inquiries. The general public communicates these concerns, comments, questions or inquiries through multiple channels as explained above.

Based on requests for information and materials, and requests for interpretations, the public-at-large, as well as the LEP community, turn to DOT very often for information about alternate-side-of-the-street parking regulations, the Staten Island Ferry schedule, and information and applications for parking permits for people with disabilities. Consequently, much attention is paid to these programs.

Notwithstanding the frequency with which the public approaches DOT for information and materials, DOT is also keenly aware that its efforts at furthering critical missions and initiatives – most notably, Mayor de Blasio’s Vision Zero initiative – requires extensive outreach, which, in turn, requires effective communication with communities, including, very often, LEP communities. Consequently, while DOT’s CSLA has always worked closely with the Borough Commissioners and planners in their outreach efforts, the CSLA is now partnering even more closely with offices of the Borough Commissioners to provide language services on Vision Zero, critical initiatives, specific street improvement projects and other programs. Effective communications in both translations and interpretation services is vital to ensure customers receive accurate and timely messages.

d) Factor 4 – Resources available to your agency

To appropriately meet the increasing demands for language services DOT has identified the need to reassess and expand its pool of existing resources. DOT continues to demonstrate its commitment to language access by maintaining a centralized language services operation consisting of: CSLA Executive Director and (1) Deputy Director; (1) Associate Staff Analyst; (2) Community Associates (translators/interpreters); (1) Graphic Artist;

(1) Clerical Associate; and (4) College Interns. DOT's Language Access Coordinator is Eleanor DiPalma, Ph.D. who reports to DOT's Chief of Communications.

In addition to CSLA's staff resources, a variety of language services are provided through the Citywide Language Services contract such as: translations, in-person interpretations; over-the-phone interpretations; transcription and sign language interpretation. All of these resources are complemented by DOT bilingual staff and by language volunteers who are registered through the Citywide Volunteer Language Bank (VLB) portal.

Internal agency resources, include but not limited to:

- DOT Customer Service Language Access centralized operation
- Citywide Language Bank Volunteers
- DOT Office of Diversity and EEO
- DOT Bilingual employees
- DOT front-line employees in public service centers located in all boroughs
- DOT employees engaged in strategic communications, training and technology

Inter-agency customer service language access resources/partnerships

CSLA continues to work closely in partnership with the Mayor's Office of Operations and the Mayor's Office of Immigrant Affairs utilizing their resources as well as offering DOT resources to expand and improve customer service language access to the benefit of customers and agencies citywide. CSLA hosts annual "Partners in Process" forums to establish, promote and reinforce customer service language access best practices utilizing a wide range of resources.

Agency wide Community Partnerships

Multiple DOT units are responsible for conveying vital transportation communications in English and in the covered languages.

DOT Project Managers and Community Liaisons interface with the public through a variety of channels (online; social media; community meetings; customer walk-in centers; phone, email and U.S. mail correspondence).

CSLA Other Than Personnel Services - OTPS

CSLA recognizes the need to adopt industry standard technological tools used by professional translators, such as translation memory software that includes electronic glossaries and style guides. With these additional tools, DOT will analyze increasing volumes of translated content produced since 2008 and use the results of that analysis to design and implement LEP customer surveys. The purpose of the surveys is to determine the register of language that customers understand to ensure readability and comprehension. These tools will significantly improve DOT's management of translation processes resulting in greater business flow efficiency and a higher volume of translations.

IV. Provision of Language Access Services

1. Translation

DOT continues to provide meaningful access to LEP customers, ensuring and moving beyond translation compliance with Executive Orders and Local Law 30. Prior to Local Law 30, DOT had been translating its most commonly distributed documents into two additional languages (Polish and Bengali) over and above the "Top

Six” language Executive Order 120 requirement. DOT has begun translating its most commonly used documents in ten languages as required by LL30.

a) Plain Language (English and 10 Local Law 30 languages)

Since 2009, DOT had utilized both internal and contracted resources to revise English documents and correspondences for readability. Since the need for language services has significantly increased, DOT has explored a more comprehensive approach to revising and redesigning its “Essential Documents” (in English) for clarity. In June 2017, DOT commissioned the services of Language Line Solutions (LLS) through a small purchase agreement to assess, analyze and evaluate DOT’s “Essential Documents” related to a variety of transportation services such as bicycle safety, parking regulations, special permits, and street lighting. LLS provided its observations and recommendations aimed at simplifying the entire set of 32 documents by categorizing the content; providing visual consistency across documents; reducing redundancies; utilizing familiar words; and reducing word count by 66%. DOT will consider using several plain language contracting resources to revise its “Essential Documents” beginning with Parking Permits and Customer Service applications, brochures and forms.

DOT recognizes that a linguistic analysis of its translation library is required to establish plain language guidelines in the LL30 languages. The results of a comprehensive linguistic analysis will yield highly valued findings useful to DOT customers and to other City agencies. DOT plans to utilize consultant services to begin analyzing its library of written and published translations for clarity. DOT will analyze the body of works available in its library of Spanish, Russian and Chinese translations, beginning with Spanish (the most widely spoken language in NYC) to determine the register of vocabulary including transportation terms, ensuring customer readability and comprehension.

b) Translation and Technology

In 2009, while envisioning the steady and increased demand for language services into the near future, DOT in partnership with DOT IT, created a language services database that serves as a request portal, providing direct access for CSLA DOT internal resources who regularly communicate with LEP communities concerning traffic improvement projects, Vision Zero and other essential transportation services. DOT continues to recognize technology as an essential programmatic infrastructure through which these vital language services can be delivered more directly and more timely to customers.

As part of its 5-year implementation plan in partnership with MOIA, MOO and DOITT, DOT is considering a variety of available technological tools such as translation management and translation memory online cloud-based software, and the like that will leverage the value gained in the more than 1,000 translations thus far produced and reviewed by CSLA over the years. CSLA in cooperation with its IT team is exploring translation data management options suitable to processing the 10 designated citywide languages.

DOT will continue to post engaging content on social media to inform customers of agency core services, projects, and initiatives. Members of the public are invited to: attend a variety of events; relay service updates and respond to requests for information and services. Social media content is provided in languages other than English. Because social media content is viewed online, many users opt to utilize translation features already available in social media channels or through the user’s web browser. Project and event notices are often translated based on the language needs of the community where the event is taking place. When these multi-lingual documents are available, DOT publishes them directly, or through links, on social media channels. DOT’s Communications Team works closely with the Mayor’s Office of Digital Strategy to share content with the City of New York’s channels, including Ciudad de Nueva York on Twitter and Facebook.

2. Interpretation

DOT continues to provide professional interpretation services, free to customers, offering more than 170 languages through language service providers: Language Line Solutions (over-the-phone) and Accurate Communication (in-person). In the past eight years, CSLA has noted a significant rise in the provisions of both in-person interpretation and over-the-phone interpretation services.

a) In-person

Annual demand for in-person interpretation services has grown dramatically in recent years, from 9 requests in 2015 to 49 in 2017. CSLA works closely with various DOT Units and Divisions to arrange for professional in-person interpreters depending upon the DOT Unit service request. Interpreters are deployed throughout the five boroughs to facilitate communications with LEP customers at community based meetings, hearings, special events such as the Mayoral debate; Safety education workshops; and for public surveys. In addition to the contractor's screening and selection of interpreters, CSLA provides additional screening to ensure the specific requirements requested by the DOT Unit are met. For example, CSLA requests and ensures that certain interpreters are assigned based on: experience; spoken dialect; familiarity with the DOT project and terminology; and their expertise in either simultaneous or consecutive mode of interpretation. For customers who require in-person sign interpretations, DOT utilizes vendor services as well as resources available through the Mayor's Office for People with Disabilities.

b) Over-the-phone

CSLA continues to utilize professional over-the-phone interpretation vendor services. Twenty-nine over-the-phone interpretation accounts have been set up for agency Public Service Centers as well as administrative offices to access interpreters on behalf of LEPS. Recently CSLA added an account for Highway Inspection Quality Assurance (HIQA) inspectors who interact with LEP customers in the field. CSLA manages monthly invoices that show call volume, call duration, date and time of call as well as the language type accessed. The demand for over-the-phone interpretation services increased significantly between 2010 and 2017. DOT facilitated language access for LEPS over-the-phone for 7,974 minutes in 2010 whereas in 2017, the total number of minutes more than tripled to 20,595 minutes.

c) Interpretation and Technology

CSLA continues to explore video remote interpretation tools that may allow DOT Street Ambassador Team to access interpreters for LEPS and for people with disabilities in the field in more appealing and suitable ways. DOT Street Ambassadors meet New Yorkers in busy areas near transportation project sites to hear their concerns and engage them in the planning and development of DOT projects regardless of their background or the language they speak, moving NYC closer toward to a more inclusive and just planning process.

Bilingual Staff and Translation/Interpretation Services

To continue supplementing agency language services provided by professional interpreters and translators, DOT utilizes the services of DOT bilingual employees who provide volunteer language services. Bilingual employees are encouraged to assist CSLA in one-on-one oral communications and/or by reviewing brief translation projects. DOT especially values the services provided by bilingual staff since their contributions are not part of their job requirements. DOT reinforces the participation of agency bilingual staff, promoting the Lan-

guage Volunteer program and providing language services tools through postings on DOT's Intranet as well as in email communications.

3. Notification of Free Interpretation Signage

Notice of "Free Interpretation Services" is available to customers in a variety of channels:

- Electronic signage and posters
- "Welcome" palm cards
- "I Speak" cards
- Language Assistance booklet for 55 Water Street customers

In partnership with DOT IT, CSLA plans to install electronic signage that includes notice of "Free Interpretation Services" in agency public service centers throughout the five boroughs.

4. Emergency Preparedness

In the event of an emergency, the DOT Press Secretary is responsible for adhering to a multi-agency communication protocol administered by NYPD and for advising CSLA immediately if any immediate translation and/or interpretations services are needed. The Language Access Coordinator will work closely with the Press Secretary and the Director of Strategic Communications, all reporting directly to DOT's Chief Communications Officer to prepare and immediately handle agency emergency responses in multiple languages with direct and proper oversight.

V. Training

a) Policies and Procedures

CSLA ensures all front-line public facing staff as well as administrators, supervisors and managers are trained in "Language Access Policies and Procedures." Training in "Voter Registration Assistance" is also provided in accordance with "Local Law 29" and "Mayoral Directive 1." Front line staff in the field and office from various DOT offices, such as Public Service Centers; Offices of the Borough Commissioner; Staten Island Ferry; Litigation Support, participate in annual face-to-face training and/or eLearning programs. CSLA tracks the number of employees trained each year by maintaining participant attendance sheets (in face to face learning formats) for input into CSLA's training records and by generating training completion reports from the eLearning system (also inputted into CSLA's training records).

The CSLA team is responsible for the design and delivery of Customer Service Language Access and Voter Registration Training. Training curricula and new methods of training delivery are updated to ensure employees are aware of current policies and procedures.

Language Access Policy and Procedures Training provides the rationale for DOT's customer service language access program and explains how and when DOT employees should facilitate language access, emphasizing customers' right to comment, complain or ask for more information. For example, in face to face training, DOT employees engage in role plays to understand how to access an over-the-phone interpreter and how to lead a three-way call with a professional interpreter and LEP customer. Staff are trained to show professional courtesy and care to customers. Newly hired front line staff receive this training in addition to the general DOT Orientation.

b) Bilingual Employees

DOT plans to invest in its human capital by providing a language support program to employees registered in the Citywide Language Bank and to DOT bilingual employees. Many of these employees are immigrants or members of immigrant families who are knowledgeable of transportation vocabularies and able to serve as field experts. CSLA partnering with DOT Learning Center will offer opportunities for volunteers to complete a language assessment and access language resources to reinforce proper grammar and use of transportation vocabulary in both translation reviews and interpretations.

VI. Record Keeping and Evaluation

Currently, DOT uses LAD (Language Access Database) to monitor and track the routing of document translation requests, clarity reviews, cost estimates and finalized translations. LAD generates reports that show the number of source and target documents as well as the number and type of translations produced.

In addition to further developing LAD as a language access request portal for use by DOT Divisions and Units agency wide, CSLA plans to adopt and utilize state-of-the-art technology such as translation management and translation memory software that will give DOT the technological capability to generate language access analytics. These technologies will allow DOT to properly analyze and monitor the volume and quality of translated content and produce analytics for improved management and cost effectiveness.

With respect to interpretation services, DOT has established a manual record keeping system that allows CSLA to monitor over-the-phone interpretation and in-person interpretation service details. The system shows the following details for over-the-phone interpretation services (call-length in minutes; call-volume per month; requested languages; name of DOT Division requesting the service) and for in-person interpretation services (requested duration of interpretation service; description of event; requested languages; DOT on-site contact information). CSLA continues to develop plans to update LAD to include additional functionality that will automate the tracking of over-the-phone and in-person interpretation service details.

CSLA continues to upgrade LAD making the user experience more streamlined and direct. For example, end users will be able to select multiple languages for translation requests without refreshing the page and LAD administrators will be able to search documents by language and more easily track translation costs.

CSLA monitors and tracks incoming LEP customer correspondences received in multiple languages through DOT web-forms. These correspondences are populated into Agency Response Tracking System (ARTS) which automatically sends email notices to the designated CSLA mailbox "languageaccess@dot.nyc.gov" for translation and response utilizing professional contractor services. CSLA plans to continue monitoring and tracking the number of bilingual staff interactions with LEPs indicated in monthly activity summary reports generated from the Citywide Volunteer Language Bank system.

Pending budget approval to adopt industry-standard translation technological tools, CSLA will adopt translation management and translation memory software to leverage the value gained in more than 1,000 translations thus far produced and professionally reviewed. With these tools CSLA will monitor and evaluate the quality of the 10 designated citywide languages translations more effectively and efficiently through special automated features such as analytics, glossaries and style guides in the 10 citywide designated languages.

VII. Resource Analysis and Planning

DOT considers and addresses the changing needs of language access services by noting consistent trends reflecting significant increases in the demands for services while ensuring adequate numbers of qualified DOT staff and contracted specialists meet those demands. Pending budget approval, DOT will outsource consultant services in plain language, customer surveys, and linguistic assessments and hire staff with specialized qualifications in: language translation, interpretation, project management and computer applications. Where possible, DOT will utilize City resources through specialized agreement with The City University of New York or secure the necessary resources through grant funding in partnership with the University Transportation Research Center or other available grant resources government posted on www.grants.gov. DOT's plan to adopt these services is referenced in more detail in other areas of this report.

CUNY and other College/University partnerships

DOT continues to develop partnerships with The City University of New York providing supervised college student internships in customer service/language access and computer application. DOT works closely with Hunter College faculty developing comprehensive language access internships and college curricula that incorporate NYC DOT vocabulary in three of the 10 designated citywide languages: Spanish, Chinese and Russian. DOT has developed a working relationship with Baruch College Survey Research Center and is considering utilizing their services to achieve goals outlined in CSLA's 5- year implementation plan.

Qualified Language Agency Personnel

DOT plans to continue reassessing the qualifications and competencies of its existing staff resources to ensure that the language access project milestones described in this plan can be satisfactorily met. Recently, DOT hired two full-time staff members who had been trained by CSLA during their Language Access college internship where they developed competencies in Spanish and Russian translation. These unit staff were hired because of their qualifications and demonstrated language competencies and community service. CSLA will continue to maintain college internship guidelines and materials including activity records of all college students who have successfully completed their language access internship requirements for the baccalaureate degree in translation and interpretation.

Utilizing industry-standard technological tools and qualified staff, CSLA expects that DOT's development of translation standards will be applied by agency and interagency language stakeholders including Language Bank Volunteers, Language Service Providers and other stakeholders. Pending budget approval, DOT plans to hire additional qualified staff: 2 full-time (1 Chinese translator/interpreter and 1 Computer Application Developer) in addition to 7 part-time translators/interpreters.

These additional staff will provide necessary services related to:

- Computer Application Developer and Translation Management IT Administrator
- Language Services computer-systems upgrades
- IT administrator of online translated DOT web content (Inter/Intranet communications)

Full-Time Chinese Translator/Interpreter

- Manage Chinese translation/interpretation projects
- Liaise with language stakeholders (DOT field experts and all other partners) to facilitate vetting of updates and further development of the DOT Chinese glossary and sections of Citywide LBV glossary

- Engage with the LEP community to enhance CSLA services
- Serve as primary agency resource in Chinese transportation vocabulary for translation and interpretation services

VIII. Outreach and Public Awareness of Language Access Services

CSLA works closely with various DOT units providing public outreach and community dialogue regarding: Vision Zero; traffic improvements, public spaces, bicycle safety, accessibility, transit development and other program areas vital to DOT's diverse transportation services network. CSLA will continue to use and develop its resource and promotional materials such as translated signage, interactive game boards, college internship brochures, compendium of CSLA newsletter articles and welcome palm cards. These materials are designed to inform the general public of DOTs language services as well as other language stakeholders such as DOT employees and college interns.

CSLA resource materials available to the public:

- Compendium of customer service language access articles
- College internship brochure that informs students of available DOT supervised internship opportunities and benefits
- Posters and other promotional materials with the CSLA brand
- Language Assistance Book containing directions and notice of free interpretation for distribution at DOT headquarters - 55 Water St. Building and Security

CSLA plans to develop translated content on the DOT website to increase public awareness of agency free translated and interpretation services.

IX. Language Access Complaints

DOT has an established procedure for handling customer complaints. Customer complaints are routed through 311 Siebel system, into DOT's Agency Response Tracking system (ARTS) for final routing to the CSLA mailbox "languageaccess@dot.nyc.gov." CSLA is responsible for reviewing, handling and responding to language access complaints.

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

Required timeframe for DOT Language Access to acknowledge and/or respond to customer complaints, questions or requests is no longer than 14 days. CSLA plans to post this established agency procedure for handling customer questions, complaints and requests on DOT CLSA Intranet pages.

X. Implementation Plan Logistics

Language Access Goal	Milestones	Responsible Staff	Deadline
Provide DOT Language Academy Certification in <i>Spanish</i> to LBVs and DOT bilingual employees	<ul style="list-style-type: none"> • Develop and administer language proficiency testing and retesting • Provide training in language proficiency • Provide proficiency retesting 	CSLA Community Associate—Spanish College Interns	2018 – 2019
Provide DOT Language Academy Certification in <i>Russian</i> to LBVs and DOT bilingual employees	<ul style="list-style-type: none"> • Develop and administer language proficiency testing and retesting • Provide training in language proficiency • Provide proficiency retesting 	CSLA Community Associate—Russian College Interns	2020 – 2021
Provide DOT Language Academy Certification in <i>Chinese</i> to LBVs and DOT bilingual employees	<ul style="list-style-type: none"> • Develop and administer language proficiency testing and retesting • Provide training in language proficiency • Provide proficiency retesting 	CSLA Community Associate—Chinese College Interns	2021 – 2022
Expand community outreach	<ul style="list-style-type: none"> • Design and distribute additional materials in a variety of formats (online, hardcopy, electronic signage) notifying customers of free interpretation and translation services • Engage in LEP dialogue at community meetings 	CSLA Graphic Artist CSLA Clerical Associate CSLA Community Associates	2018 – 2022

<p>Develop NYC DOT Translation/Interpretation Standards</p> <p>A. Translation Management and Memory Software</p>	<ul style="list-style-type: none"> • Select and purchase suitable software for use in translating Spanish, Russian, and Chinese content for DOT webpages and documents • Adopt translation management and memory software 	<p>DOT CSLA and IT in consultation with DoITT and MOIA</p>	<p>Spring 2018</p>
<p>B. Glossary and Style Guide in Spanish, Chinese, and Russian</p>	<ul style="list-style-type: none"> • Develop Spanish, Chinese, and Russian Glossaries and Style Guides 	<p>CSLA Community Associates - Spanish and Russian</p> <p>CSLA Community Associate - Chinese and Computer Associate, pending budget approval</p> <p>College Interns</p>	<p>2018 – 2020</p>
<p>C. Glossary and Style Guide in remaining LL30 Languages</p>	<ul style="list-style-type: none"> • Develop glossaries in remaining LL30 Languages 	<p>Part-time translators, pending budget approval</p>	<p>2020 – 2022</p>
<p>D. Plain Language Survey</p>	<ul style="list-style-type: none"> • Identify the representative sample of LEP customers in Spanish, Chinese, and Russian • Develop and Implement Survey 	<p>Consultants (linguists and survey researchers)</p> <p>DOT LBVs and bilingual staff</p> <p>CSLA Community Associates (Spanish, Russian and Chinese) & Computer Associate</p> <p>College Interns</p> <p>Graphic Artist</p>	<p>2019 - 2020</p>
<p>E. Plain Language Revision of Essential Documents</p>	<ul style="list-style-type: none"> • First draft plain language revision of Parking Permits and Customer Service unit applications, brochures and forms 	<p>DOT staff – CSLA and Parking Permits and Customer Service and Plain Language Consultant Team</p>	<p>2019 - 2020</p>

<p>F. Increase public awareness of CSLA</p>	<ul style="list-style-type: none"> • Expand existing translated content on DOT's external website • Publish DOT Essential documents on DOT's external website 	<p>CSLA staff Community Associates</p> <p>CSLA Community Associates (Spanish, Russian and Chinese) & Computer Associate</p> <p>College Interns</p> <p>Graphic Artist</p> <p>Clerical Associate</p>	<p>2020 – 2022</p>
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