



Department of Motor Vehicles
Agency of Transportation

120 State Street
Montpelier, Vermont 05603-0001
(voice) 802.828.2000
dmv.vermont.gov

To: Joint Transportation Oversight Committee

From: Wanda Minoli, Commissioner, Department of Motor Vehicles

Date: October 15, 2019

Subject: Update on Status of New Americans Language Implementation

In accordance with Act 60, Sec. 27(b) and in partnership with US Committee on Refugees and Immigrants - Vermont, please find attached a written update of the status of the implementation of Secs. 23-26 regarding the translation of written forms and examinations required prior to licensure in the state of Vermont.

I. Languages Identified –

In accordance with Act 60, Sec. 23(b), following discussions with representatives from U.S. Committee on Refugees and Immigrants Vermont (USCRI-VT), the Department has agreed that the following forms will be translated into the languages indicated below.

Forms, Applications and Tests to be Translated:

- Vermont Residency Certification Form
- Application for Non-Driver Identification
- Application for License/Learner Permit
- Learner Permit Knowledge Test

Languages Identified as Primary Languages of Refugees Served by USCRI-VT:

- Arabic
- Burmese
- Kirundi
- Nepali
- Swahili

Languages in which Knowledge Tests are Currently Offered:

- English
- French
- Serbo-Croatian
- Somali
- Spanish

The Department currently offers the Application for License/Permit in English and Spanish and has made the business decision to offer the residency certification form and two applications in the ten languages identified above.

II. Interpreters on Road Tests –

In accordance with Act 60, Sec. 24(c) and in partnership with USCRI-VT, the Department has begun development of modified policy and procedures to allow for the use of an interpreter on the road test. Through our discussions with USCRI-VT, the Department learned that the majority of USCRI-VT's clientele are located in the Chittenden County area. As a result, it was agreed that the pilot location for developing procedures around the use of interpreters during the road test will be the South Burlington DMV office.

In addition, the Department conducted a survey of American Association of Motor Vehicle Administrators (AAMVA) member jurisdictions to gather information on the use of interpreters on road tests. Twenty-nine jurisdictions responded to the survey, of the 29 respondents ten jurisdictions indicated that they allow for the use of interpreters during a road test. One additional jurisdiction (Wisconsin) indicated that while they do not allow the use of interpreters during a road test, a portion of their examiners are multilingual and administer the test in the applicant's language of choice when available.

Jurisdictions Allowing the use of Interpreters on Road Tests:

Jurisdiction	Restrictions/Requirements
Delaware	No restrictions on age, relationship to applicant or certification requirement Must sit in the rear seat and may only relay instructions
Florida	Interpreter must be over 18 Preferred to not be a relative of applicant
Iowa	American Sign Language only
Idaho	Interpreter must sign liability waiver and cannot be related to applicant
Illinois	Interpreter required to provide proof of ID
Louisiana	No restrictions on age, relationship to applicant or certification requirement
Michigan	Allowed on road test for autos or motorcycles
Mississippi	Usually restricted to hearing impaired applicants
New Mexico	No restrictions on age, relationship to applicant or certification requirement
Texas	Interpreter must prove certification

III. Educational Plan –

In accordance with Act 60, Sec. 26, the Department has collaborated with representatives from USCRI-VT and the Association of Africans Living in Vermont (AALV) to review the training requirement and developed an implementation plan as follows. In 2017 the Agency of Transportation developed and administered a comprehensive training seminar entitled “DMV Understanding and Overcoming Bias in the Workplace”. The training focused on developing an understanding of explicit and implicit bias and how it can lead to discrimination in workplace decisions and dynamics with co-workers and the general public. Participants were given tools to aid them in recognizing and overcoming prejudice and stereotyping, as well as to promote a welcoming culture.

All DMV staff completed “DMV Understanding and Overcoming Bias in the Workplace” training in 2017. In addition, an abbreviated version of the training has since been added to the Agency’s initial on-boarding training. While staff hired since 2017 have been exposed to much of the material featured in the full-length training, after consulting with representatives from both USCRI-VT and AALV, we have agreed that all current DMV staff who have not successfully completed “DMV Understanding and Overcoming Bias in the Workplace” training will do so by 12/31/2019.

The Department is currently working with staff at the VTrans Training Center to schedule three sessions to ensure the roughly 50 employees will be able to attend without negatively impacting Vermonters seeking service.

In addition, representatives from AALV and USCRI-VT have agreed to partner with the Department in modifying “DMV Understanding and Overcoming Bias in the Workplace” to incorporate training for staff on interacting with persons utilizing an interpreter and on how staff can assist Vermonters in accessing interpretation services. Upon completion in early 2020, all DMV staff will be required to attend an updated refresher training.

IV. Costs –

In accordance with Act 60, Sec. 23(b) the Department has received quotes to translate the form, applications and test questions used in licensing.

Translation of Documents – The State of Vermont is currently under contract with Telanguage, Inc to provide translation services. The Department has received a quote for the translation of the form and two applications. Total cost to translate the Vermont Residency Certification Form, Application for Non-Driver Identification, and Application for License/Learner Permit into the nine languages identified is \$14,198.82.

Translation of Test Questions – The Department’s automated testing vendor, Intellectual Technologies, Inc., will translate the Learner Permit Knowledge Test questions into Arabic, Burmese, Kirundi, Nepali and Swahili and incorporate the exams into the automated testing system. Translation and computer programming required to implement the new tests is expected to be complete in the spring of 2020 with a total anticipated cost of \$19,086.89.

V. Roadblocks and Recommended Solutions –

In order to ensure the safety of the applicants, interpreters, examiners and motoring public and the reliability and validity of the road test our recommendation is that further exploration of the feasibility and associated costs of utilizing professional interpreters occur.

To accommodate the administration of knowledge tests through our automated testing system in all of the languages identified, the Department will be required to upgrade all testing stations in the eleven locations to operate on Windows 10 prior to implementation. Agency of Digital Services staff have started the project and work is ongoing.

USCRI-VT has indicated that they are able to provide the translation of the two applications and form for less than the amount quoted by the vendor who holds the State contract. The Department is currently collaborating with USCRI-VT to determine if a sole-source contract is feasible.