

To: Wanda Minoli, Commissioner of Transportation
From: Amila Merdzanovic, USCRI Vermont Director
Cc: Maree Oddoux, USCRI Vermont and UVM MSW
Dave Gunderson, UVM MSW
Tom Eckert, UVM MSW



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Subject: Meaningful Access to Driving Licensure for Vermonters with Limited English Proficiency

For refugees and other immigrants with Limited English Proficiency (LEP) living in Vermont, access to becoming a licensed driver has a critical impact on livelihood, community integration, and upward mobility in employment.

An overwhelming majority of open employment opportunities for individuals with LEP require a driver's license explicitly or implicitly. This is one of the chief contributing factors in the unemployment, underemployment, and out-migration of refugees resettled to Vermont.

The Vermont Department of Motor Vehicles' (DMV) Title VI Policy Statement ensures non-discrimination against LEPs in all of its programs and activities. Meanwhile, Vermont residents with LEP are faced with unnecessary barriers at the DMV and are denied meaningful access to obtaining a driver's license:

- The 77-page Vermont Driver's Manual—the only DMV-provided, comprehensive study resource for the written knowledge test—is exclusively provided in English and Spanish.
- The written knowledge test is available in only five languages—English, Spanish, Serbo-Croatian, French, and Somali. The primary languages of refugees actively being resettled in Vermont are Kiswahili, Nepali, Kirundi, Burmese, and Karen. Other states, such as Rhode Island and California, offer the written knowledge test in over 30 languages. Many states also offer sample tests and other study materials in an extensive number of foreign languages.
- Currently, the Vermont DMV does not offer any interpreting services for individuals with LEP. If an applicant wishes to use a language interpreter during the written knowledge test, they must provide the interpreter themselves. The unregulated use of interpreters without formal training is highly problematic. Inaccurate interpretation of the written knowledge test raises serious public safety concerns and can also result in unnecessary exam failures, stress, and excessive financial burdens among applicants.
- Vermont DMV regulations do not allow anyone other than the applicant and the examiner in the vehicle during the road test. Hence, to obtain a driver's license, all applicants must pass the road test in English. The Maryland DMV, on the other hand, has a 26-page list of DMV approved interpreters and translators, and offers free, professional interpretation services during the road test.

The Vermont DMV's lack of translated materials and interpretation services produce chronic underemployment for individuals with LEP, pose safety concerns for all Vermont drivers, and intensify the oppression and marginalization of ethnic minorities in our community. Access to obtain a driver's license is intended to be reserved to those who can demonstrate that they possess the skills and knowledge to drive safely, not reserved to those who can demonstrate the skills and knowledge in English.

Providing DMV-regulated interpretation services and relevant translated exams and study materials is a critical step towards dismantling barriers to employment for New Americans that would align DMV processes with Title VI guidelines.