



Commonwealth of the Northern Marianas Islands  
**Commonwealth Office of Transit Authority**  
Office of the Governor



## **Updated Limited English Proficiency Policy Plan**

### **Introduction**

The purpose of a Limited English Proficiency (LEP) Policy Plan is to clarify the responsibilities of recipients of federal financial assistance from the U.S. Department of Transportation (DOT) and assist them in fulfilling their responsibilities to limited English proficient (LEP) persons, pursuant to Title VI of the Civil Rights Act of 1964 and implementing regulations. It was prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C 2000d, et seq., and its implementing regulations provide that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance, and;

### **Executive Order 13166**

Executive Order 13166 "Improving Access to Services for Persons with Limited English Proficiency," reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency that is subject to the requirement of Title VI to publish guidance for its respective recipients clarifying that obligation. Executive Order 13166 further directs that all such guidance documents be consistent with the compliance standards and framework detailed in the Department of Justice's (DOJ's) Policy Guidance entitled "Enforcement of Title VI of the Civil Rights Act of 1964. National Origin Discrimination against Persons With Limited English Proficiency." (See 65 FR 50123, August 16, 2000 DOJ's General LEP Guidance). Different treatment based upon a person's inability to speak, read, write, or understand English may be type of national origin discrimination.

Executive Order 13166 applies to all federal agencies and all programs and operations of entities that receive funding from the federal government, including state agencies, local agencies such as the Commonwealth Office of Transit Authority and governments, private and non-profit entities, and sub recipients.

## Summary

To determine the Commonwealth Office of Transit Authority's extent of obligation to provide LEP service, the Commonwealth Office of Transit Authority undertook a U.S. Department of Transportation four factor LEP analysis which considers the following:

- 1) The number or proportion of LEP persons eligible in the Commonwealth Office of Transit Authority service area who may be served or likely to encounter a Commonwealth Office of Transit Authority program, activity, or service.
- 2) The frequency with which LEP individuals come in contact with a Commonwealth Office of Transit Authority service.
- 3) The nature and importance of the program, activity or service provided by the Commonwealth Office of Transit Authority to the LEP population.
- 4) The Resources available to the Commonwealth Office Transit Authority and the overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

## 5) Four Factor Analyses

1. **The number or proportion of LEP persons eligible in the Commonwealth Office of Transit Authority service area who may be served or likely to encounter a Commonwealth Office of Transit Authority program, activity, or service.** Data from the U.S. Census Bureau indicated that the size of language groups other than English in the CNMI is 71% or less of the total population of 53, 883. The Commonwealth Office of Transit Authority examined the US Census report from 2010 and the Bureau's American Community Survey and was able to determine that approximately 71% or 38, 257 people within the Commonwealth Office of Transit Authority service area age 5 and older spoke a language other than English at home with only 8,354 speak English. Of the 40, 702 reporting they speak other languages less frequently than English. 13, 476 speak other languages equally often as English; 19, 054 speak other languages more frequently than English and 791 does not speak English. The Filipino language comprised the largest non-English speaking language group with 46% or 19,017. The other largest non-English speaking language group was Chamorro languages at 29% or 12, 902 while the other indigenous Carolinians comprised of 2,461 speak their native tongue at home.

There are Asian languages with population of 5 years and over 6,897 that speak Chinese, Korean and Other Asian languages at home. According to the census, at least 3,316 Chinese, 2,295 Koreans and 1,286 other Asian languages spoken at home.

2. **The Commonwealth Office of Transit Authority assessed the frequency at which staff and drivers have or could possibly have contact with LEP persons, via verbally surveying drivers and dispatchers.** Because the Commonwealth Office of Transit Authority was created in August 2011 and the initial FTA funds was awarded in December 2012, COTA has not had any requests for interpreters and/or translated Commonwealth Office of Transit Authority documents. However, COTA made an effort in translating the COTA's Title VI requirement into Tagalog (Filipino) Language is made available in COTA's website and paratransit vehicles.

**3. The nature and importance of the program, activity, or service provided by the Commonwealth Office of Transit Authority to the LEP Community.** There aren't any large geographic concentrations of any one type of LEP individuals in the Commonwealth Office of Transit Authority service area. The overwhelming majority of the population native tongues of Chamorro, Carolinian uses or speaks English as a second language.

Therefore, there is a lack of any social, service, professional and leadership organizations within the Commonwealth Office of Transit Authority assessed service that focuses on outreach or membership of LEP individuals.

**4. The resources available to the Commonwealth Office of Transit Authority and overall costs.** The Commonwealth Office of Transit Authority assessed the available resources that could be used for providing LEP assistance. This included identifying how much a professional interpreter and translation service would cost on an as needed basis, which documents would be the most valuable to be translated if and when the populations would support it.

After analyzing the four factors, the Commonwealth Office of Transit Authority does not feel that an LEP plan is needed at this time.

### **LEP Guidelines**

The Commonwealth Office of Transit Authority will use the following guidelines to assist persons with limited English proficiency.

1. The Commonwealth Office of Transit Authority will have the Census Bureau's "I speak Cards" available at the Commonwealth Office of Transit Authority Operations building. Although staff may not be able to provide immediate translation assistance, we will utilize the cards to identify language needs.
2. If an interpreter is needed immediately, in person or in the telephone, staff will use the "I Speak Cards" to help determine what language assistance is needed. Cota will constantly update its listing of its resources who can speak Chamorro, Carolinian and Filipino. Staff shall then contact Chamorro Carolinian Language Policy Commission for assistance. The Commonwealth Office of Transit Authority will add Title VI Policy and Complaint Procedures in our webpage.
3. The Commonwealth Office of Transit Authority will educate our staff on the following procedures.
  - a. Understanding the Title VI Policy and LEP responsibilities;
  - b. How to access language assistant services via (670) 664-5321
  - c. Document language assistance requests
  - d. The procedure if a Title VI and/or LEP complaint is filed.

Based on the Four Factor Analysis review, the Commonwealth Office of Transit Authority will provide a meaningful access to limited English proficiency persons and hereby approved its Limited English Proficiency Plan or LEP.

Approved by,

Date: 10/1/19



ALFREDA P. CAMACHO  
Special Assistant for Public Transportation  
Commonwealth Office of Transit Authority  
Suite 216, Marianas Business Plaza, Susupe  
Office of the Governor  
Caller Box 10007  
Saipan, MP 96950

Phone: (670) 664-2682 Ext. 102  
Fax: (670) 664-2692  
Email: [alfreda.camacho@gov.mp](mailto:alfreda.camacho@gov.mp)  
Website: <http://cnmicota.wixsite.com/cota-mp>



**RALPH DLG. TORRES**  
Governor

**ARNOLD I. PALACIOS**  
Lieutenant Governor

COMMONWEALTH of the NORTHERN MARIANA ISLANDS  
**OFFICE OF THE GOVERNOR**

**FOR IMMEDIATE RELEASE**

June 18, 2019

**Limited English Proficiency (LEP) Policy Plan and Public Participation Plan**

Governor Ralph DLG. Torres and Lt. Governor Arnold I. Palacios through the Commonwealth Office of Transit Authority (COTA) would like to notify the general public that COTA is updating its Limited English Proficiency (LEP) Policy Plan and Public Participation Plan.

A copy of the LEP and the Public Participation Plan can be obtained at the Commonwealth Office of Transit Authority. Written comments must be submitted directly to the Commonwealth Office of Transit Authority, Suite 216, Marianas Business Plaza, Susupe, Saipan or via email to: [alfreda.camacho@gov.mp](mailto:alfreda.camacho@gov.mp) no later than July 1, 2019, 2:00 p.m.

For any questions, please contact Mr. Diego Songsong, COTA Community Planner, at (670) 664-2682.

###

**Media Contact:**

Alfreda P. Camacho  
Special Assistant  
Commonwealth Office of Transit Authority  
[alfreda.camacho@gov.mp](mailto:alfreda.camacho@gov.mp)  
670.664.2682