



**Language Access Plan (LAP)
For Persons Who Are Limited English
Proficient (LEP) and/or Deaf or Hard of
Hearing (DHH)**

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**STACY ELARMO
VICE PRESIDENT OF PEOPLE OPERATIONS**

I. Introduction:

This Language Access Plan (LAP) is promulgated and implemented to provide timely and meaningful access to all individuals who require services from the Teleguam Holdings, LLC dba GTA, regardless of race, color, national origin, or limited capability to speak, read, or understand the English language. The company understands the critical nature and connection between access to programs and language assistance services regarding essential communication services.

II. Purpose:

The Language Access Plan is developed to provide timely, meaningful, and equal access to programs, services, and/or information to persons who are limited English Proficient (LEP) or Deaf and Hard of Hearing (DHH) in compliance with E.O. 13166 (65 FR 50121), Improving Access to Services for Persons with Limited English Proficiency.

III. Policy Statement

This Language Access Plan (LAP) for Persons who are Limited English Proficient (LEP) and/or Deaf or Hard of Hearing ("LEP/DHH Plan") is in compliance with Title VI of the Civil Rights Act (Title VI) of 1964, as amended, 42 U.S.C. § 2000d, and the DOJ implementing regulation, 28 C.F.R. pt. 42, subpts. C & D (prohibiting discrimination in federally assisted programs based on race, color, and national origin in the delivery of services or benefits), Office of the Governor or Guam Executive Order 2015-15, and pursuant to the U.S. Presidential Executive Order of 13166.

The employees will inform members of the public that language assistance services are available free of charge to persons who are Limited English Proficient (LEP) and/or Deaf or Hard of Hearing (DHH). All personnel shall coordinate language assistance services for persons who are LEP/DHH through the identified Language Assistance (LA) Coordinator, Administration Division, or designated alternate(s).

The designated LA Coordinator is Ms. Jennifer Taitano. The Alternate LA Coordinator is Ms. Stacy Elarmo. These individuals are authorized to activate interpreters and/or translators for language assistance services for individuals who are LEP/DEH persons. LA Coordinator is tasked with monitoring sufficiency of all signs to ensure maximum communication with the public.

IV. Background

The company's customer population base is diverse, representing residential and businesses in Guam and throughout Micronesia. Based on the 2020 Census Island Areas Demographic and Housing Characteristics file for Guam. Guam's population was 153, 836. With its close proximity to the Asian-Pacific region, Guam is the gateway to the United States from Asia and neighboring Pacific islands. Although English is the primary language in Guam, other language spoken include Chamorro, various Filipino dialects, (e.g., Tagalog, etc.), Korean, Japanese, Chinese, Chuukese, Kosraean, Pohnpeian, Yapese, Palauan, Vietnamese, and American sign Language. As reported in the 2020 Census Bureau, the population of Chamorro as 50,240 count, Chuukese at 10,274 count. The most significant Asian populations reported are Filipino with 44, 793, Korean at 3,483 and Japanese with 2,108.

Due to the island's physical and social geographic isolation, resources such as translators and interpreters for certain languages may be extremely limited or unavailable on island. With this limitation, many LEP/DHH persons are found to rely on their family, neighbors, or other customers to assist and interpret for them. To minimize these language and communication barriers, the company will employ Trainings during Onboarding and through Operational Process and Product knowledge for proposer service levels for these needed services.

As a reference, the company's statistics of servicing individuals include an annual inquiry on the GTA Website of over 300 inquiries. In the retail outlets, from January through November 2024, it was noted 30 individuals requested language assistance during the time of in-store visits.

Federal law prohibits discrimination on the basis of race, color, national origin, or limited capacity to speak, read, or understand the English language, and requires federally funded programs to take reasonable steps to provide meaningful access to programs, services and information to individuals who are LEP/DHH. The company's LEP Plan is consistent with Title VI of the Civil Rights act of 1964, which states "No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits or be subjected to discrimination under any program or activity receiving Federal Financial assistance."

After a U.S. Supreme Court ruling in 1997, redefined the Title VI Act that holds responsible the entire organization who is a recipient of federal funds if a discrimination complaint is files, and not just the specific complaint was filed.

V. Implementation of a LEP/DHH Policy and Ongoing Planning through Four-Factor Analysis

a. These Factors are:

1. The number or proportion of LEP/DHH Persons served or encountered in the eligible service population.
2. The frequency with which LEP/DHH Persons come in contact with the program.
3. The nature and importance of the program, activity, or service provided by the program (Rank activities or services based on level of importance; reasonableness)
4. The resources available to the recipient.

The company is supported by departmental groups including Human Resources, Customer Service, Retail Operations, Network Operations, Marketing, Call Center, Finance and Regulatory. In determining the reasonable steps in implementing a LEP/DHH Plan using the Four factor analysis, the company will integrate intake fields to populate Bi-lingual Staff resources by department as well as have readily available language assistance resources for front line staff. Where applicable, the computer aided login system will add in visitor specific data including nature of the visit, ethnicity, and need for interpreter services with the Qmatic customer scheduling system.

b. Procedures

i. Determining the need for an interpreter

1. Determine the language used. GTA will integrate at front facing levels the inquiry “Do you need language assistance such as interpreter or translator?”
2. Request assistance from LA coordinator
3. Identify bilingual staff
 - Chamorro
 - Tagalog/ Filipino
 - Chuukese
 - Korean

Bilingual employee listing which will be updated periodically.
4. Have Guide of external resources and maintain a list of organizations that are willing to provide language assistance
5. Protocol during emergency to include LA Coordinator and Alternate communication as per the company’s escalation steps. All reasonable attempts will be made to contact an interpreter by telephone in order to effectively respond to the emergency.

ii. Notice

1. Signages will reflect language assistance for the Employee and Mass Communication mediums.

iii. Staff Training

1. Develop training for staff on how to properly identify LEP/DHH persons, differentiate various languages being spoken, understand cultural differences and issues, and deliver services to LEP/DHH persons.
2. Periodic training and documented
3. To be included in orientation packets and departmental training.

c. Compliance Monitoring and Updating of Plan and Policy

i. Annual review and update of plan

ii. Evaluation Criteria

1. Assessing the number of LEP/DHH persons requesting interpreter services from GTA
2. Assessing current language needs to determine if additional services and/or translated materials should be provided (e.g., forms, information brochures, etc.)
3. Assessing the knowledge GTA employees possess of LEP/DHH policies and how to provide language assistance services to LEP/DHH persons

- iii. Departmental Updates to be planned:
As applicable, the company will consider ethnicity as part of their intake for customer services, to include collecting this information.
- iv. Grants Administration Team is responsible for drafting updates, analyzing data trends, and upkeep of the Language Access Plan.
- v. LA Coordinator and Alternate will collaborate with departments to ensuring brochures and signs are translated, mitigating problems, training personnel on procedures, and adjusting procedures as needed
- vi. LA Coordinator to coordinate to post LEP on the GTA website

d. Definitions

- i. **Limited English Proficient (LEP) Person** – Persons with limited English proficiency. English is not their primary language, and they have a limited ability to read, write, speak, or understand English. Many LEP Persons are in the process of learning English and may, read, write, speak, and/or understand some English, but not proficiently. LEP status may be context-specific. An individual may have sufficient English language skills to communicate basic information (such as name, address, etc.), but may not have sufficient skills to communicate detailed information in English (e.g., medical information, eyewitness accounts information elicited in an interrogation, etc.).
- ii. **Primary Source Language** – A language of the speaker which is interpreted into second language. An individual’s native tongue or the language in which an individual most effectively communicates
- iii. **Interpretation** – The act of listening to a communication in one language (source language) and orally converting it to another language (target language) while retaining the same meaning.
- iv. **Translation** – The replacement of written text from one language (source language) into an equivalent written text in another language (target language).
- v. **Bilingual** – Refers to the ability to use two languages proficiently.
- vi. **Bilingual Employee/Staff Interpreter and/or Translator** – GTA staff employees with bilingual proficiency in source and target languages.
- vii. **LA Coordinator** – Language Assistance Coordinator – oversee implementation and annual updates of the LEP/DHH plan.
- viii. **DHH or Deaf or Hard of Hearing** – A person who is disabled because of hearing, communication, or speech disorder, or has difficulty in speaking or comprehending the English language, is unable to fully understand the proceedings in which the person is required to participate and thus is unable to obtain due process of law.

e. Contacts:

GTA'S Language Assistant Coordinators and their contact information:

- LA Coordinator:

Jennifer Taitano, 671 487 5888
Email: Jctaitano@gta.net

- Alternate LA Coordinator:

Stacy Elarmo, 671 488 5185
Email: stacy@gta.net

f. Exhibit A Translation Intake Script:

Script for translations:

ENGLISH:

Please inform us if you require language assistance services.
We will make every attempt to locate an interpreter to assist you.

For further assistance, please call this number: _____. Thank you.

CHAMORRO

Put fabot, na'tungo'ham yanggen un nisisita ayuda gi trinanslâdan lengguâhi.
Bai in espiha empeñu na u guaha entetpeti para u inasiste hao.
Para mãs na ayudu, âgang ham put fabot gi: _____. Si Yu'os ma'ásé

TAGALOG

Ipagbigay alam lamang kung kayo ay nangangailangan ng tulong ng tagapagsalin.
Sisikapin naming maghanap ng tagapagsalin para tumulong sa inyo.
Maari lamang tawagan ang _____ kung kina kailangan. Salamatpo.

CHUUKESE

Kich sipwe achocho kuttâ emon chon Chiakuu epwe enisuuk.
Ka tongeni kokori ei nampa: _____. Kinosou chapur.