



STATE OF ILLINOIS Human Rights Commission



Language Access Plan: Overview of Standards and Current Systems and Practices

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SECTION 1: INTRODUCTION AND BACKGROUND

INTRODUCTION

The State of Illinois is home to one of the largest immigrant populations in the United States, with nearly 1.9 million immigrants contributing to the state’s vibrant cultural and economic landscape. Among them, nearly 1 million residents speak languages other than English at home and report speaking English less than “very well.” As this linguistically diverse population continues to grow, Illinois recognizes that all residents—regardless of English proficiency—have a right to equitable access to government services.

This Language Access Plan outlines the Illinois Human Rights Commission’s five-year plan for language access implementation, a timeline selected to achieve greater alignment with the Language Equity and Access Act. Section 1 of the Language Access Plan sets the stage for the plan by providing an overview of the Illinois Human Rights Commission and establishing the purpose, goals, and guiding principles that anchor the Language Access Plan. Sections 2 to 7 address specific areas of language access implementation. Each area of implementation is addressed in two distinct parts, which include:

1. **Overview of Standard:** A brief description of the standard based on federal guidance and the Language Equity and Access Act.
2. **Current Systems and Practices:** A description of the current practices, existing infrastructure, and/or progress to date in relation to the standard implementation goals and 5-year action plan.
3. **Implementation Goals:** An overview of the overarching goals for meeting compliance objectives.
4. **5-Year Action Plan:** A list of detailed time-bound action items to be completed in three phases over an implementation period of five years (the timeframe for a phase is subject to modification):
 - a. Phase I (Year 1)
 - b. Phase II (Years 2 and 3)
 - c. Phase III (Years 4 and 5)

ILLINOIS HUMAN RIGHTS COMMISSION

The [Illinois Human Rights Act](#), 775 ILCS 5/1-101, became effective on July 1, 1980. It was enacted to prevent unlawful discrimination in the areas of employment, real estate transactions, access to credit, public accommodations, and education. The Act consolidated

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and strengthened existing civil rights laws in Illinois by amending or repealing other laws. It also simplified enforcement procedures by replacing a number of separate agencies with two new agencies responsible for administering the Act: the Illinois Department of Human Rights and the Illinois Human Rights Commission.

The Illinois Department of Human Rights (“Department”) and the Illinois Human Rights Commission (“Commission”) play coordinated but separate roles in administering the Illinois Human Rights Act. The Department is the investigatory agency that accepts or initiates charges of discrimination and determines whether there is substantial evidence of a violation to warrant filing a complaint with the Commission. The Commission is the adjudicatory agency that holds hearings and issues decisions on complaints alleging violations of the Act. The Commission also decides requests for review of the Department’s decision to dismiss a charge or hold a respondent in default. The Commission strives to provide professional, competent, and considerate service and ensure all residents of the state have equal access to its information, services, programs, and activities.

The Commission’s website is <https://hrc.illinois.gov/>.

The Commission’s Language Access Coordinator is Emily Curosh.

The Commission’s divisions, offices, and programs include the Administrative Law Section and the Office of the General Counsel.

PURPOSE AND GOALS

This Language Access Plan aims to provide guidance to the Commission’s staff and establish a roadmap to support meaningful access to the Commission’s services and programs for people with limited English proficiency. The Language Access Plan also seeks to align the Commission’s efforts and bring the Commission into compliance with the Language Equity and Access Act, the Illinois Civil Rights Act of 2003, Title VI of the Civil Rights Act of 1964 and other applicable federal and state standards and guidelines.

Title VI of the Civil Rights Act of 1964

As a recipient of federal financial assistance, Illinois is bound by Title VI of the Civil Rights Act of 1964 (“Title VI”), 42 U.S.C. §§ 2000d-2000d-7, and its implementing regulations, 45 C.F.R. Part 80, which prohibits discrimination based on race, color, or national origin (which includes limited English proficiency). Illinois is committed to advancing the goals of Title VI in alignment with the Language Equity and Access Act.

Illinois Civil Rights Act of 2003

The [Illinois Civil Rights Act of 2003](#), 740 ILCS 23/1, prohibits state, county, or local governments in Illinois from excluding a person from participation in, denying a person the benefits of, or subjecting a person to discrimination under any program or activity on the grounds of that person's race, color, national origin, or gender. Additionally, the Illinois Civil Rights Act prohibits using criteria or methods that have a discriminatory effect.

Language Equity and Access Act

Signed into law by Governor JB Pritzker in 2024, the [Language Equity and Access Act](#), 15 ILCS 56/1, aims to ensure that all residents can access state information, programs, and services equitably, and that limited English proficiency does not prevent anyone from fully participating in civic life. The Act aims to ensure all Illinois residents, including individuals with limited English proficiency, have meaningful and equitable access to state services, programs, information, and activities by removing language barriers. The Act incorporates federal guidance for ensuring meaningful access and other federal and state legislation that prohibit discrimination based on national origin and promote language access, including Title VI, the Illinois Human Rights Act, and the Illinois Civil Rights Act of 2003.

The Act designates the Governor's Office of New Americans ("ONA") as the lead agency responsible for coordinating the implementation of statewide language access policy. ONA is tasked with providing oversight, offering technical assistance, and ensuring agency compliance with the Act's requirements. Under the Act, ONA will lead the development of a Language Needs Assessment Report using U.S. Census data to identify the languages spoken across Illinois and inform agency planning. All agencies will develop Language Access Plans that will inform how the agency will ensure meaningful access to individuals with limited English proficiency, appoint a Language Access Coordinator to oversee implementation within each agency, and translate vital documents and provide qualified interpretation services.

GUIDING PRINCIPLES

In accordance with federal and state requirements, including the Language Equity and Access Act, this Language Access Plan provides a framework for ensuring the Commission can deliver timely and meaningful language assistance services to individuals with limited English proficiency. The Commission is committed to providing equitable language access to its services, programs, and activities for all individuals, regardless of their primary language. The Commission will operationalize this commitment to language access through the following guiding principles:

- Designating a Language Access Coordinator who is responsible for overseeing the development and implementation of the Language Access Plan.

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- Serving all individuals with limited English proficiency and providing accurate, timely, and effective communication, including oral and written language services needed to communicate effectively, and providing them with equal opportunity to participate fully in the services, activities, or other programs administered by the state. This includes displaying public notices in commonly spoken languages that communicate the availability of language assistance services and how to access them.
- Conducting a regular assessment that describes the population of persons with limited English proficiency the agency serves, the policy and programmatic actions implemented to ensure meaningful access, and the metrics used to measure compliance with the Language Equity and Access Act. This assessment will be informed by the federally recognized four-factor analysis, which considers the number or proportion of persons with limited English proficiency served, the frequency and context, the nature and importance of services provided, and the agency's available resources and costs.
- Strengthening the capacity to develop and distribute multilingual content and expanding access to translated vital documents and other resources. Translation of vital documents will be prioritized with guidance provided by ONA. The Commission also will work to expand multilingual website content, including program information, complaint procedures, and eligibility criteria.
- Establishing mechanisms to track progress across divisions, programs, and funded partners and supporting efforts to meet language access compliance standards. This includes collecting and reporting data on how to use interpretation and translation vendor services, including volume, language type, and service type. The Commission will maintain a complaint and review process and ensure timely resolution.
- Providing ongoing employee development and training to maintain well-trained Multilingual Staff and general staff. The Commission also will collect and report data on Multilingual Staff roles, language certifications, and language capacity across its workforce.
- Ensuring the Language Access Plan and related materials are publicly available through the Commission's website and other accessible formats.

DEFINITIONS

- **Coordinating Entity:** the entity housed in ONA that is assigned to coordinate the efforts of State Agencies to provide meaningful language access to individuals with limited English proficiency in accordance with the Language Equity and Access Act
- **Four-Factor Analysis:** a framework intended to aid recipients of federal financial assistance with conducting an individualized assessment of their programs and activities to help them prioritize language access services.

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- **Funded Entity:** any contractors, grantees, and recipients that receive financial assistance from the State Agency for the purpose of delivering programs, activities, research, information, or services to the public.
- **Individuals with LEP:** individuals who self-identify as speaking English less than “very well” according to the U.S. Census American Community Survey.
- **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.
- **Language Access:** the process of ensuring that Individuals with LEP have access to vital documents and services in a language they can understand, either through Interpretation or translation services. *See Meaningful Language Access.*
- **Language Access Coordinator (“LAC”):** staff of a State Agency tasked with coordinating and overseeing the entity’s Language Access implementation activities and Language Access Liaisons to ensure that Language Access information is shared across all State Agency programs and divisions.
- **Language Access Liaison (“LAL”):** staff of a division, program, or Funded Entity tasked with coordinating and overseeing the entity’s Language Access implementation activities, under the direction of a LAC.
- **Language Access Plan (“LAP”):** a management document and roadmap that outlines the tasks and priorities to be implemented to ensure the State Agency will meet compliance standards set forth in the Language Equity and Access Act.
- **Language Assistance Services:** oral and written language services needed to assist Individuals with LEP to communicate effectively with staff and provide meaningful access to, and equal opportunity to participate fully in, the services, activities, or other programs administered by the state.
- **Limited English Proficiency (“LEP”):** the inability or difficulty to understand or to effectively express oneself in spoken or written English because of one’s national origin.
- **Meaningful Language Access:** the ability to receive accurate, timely, and effective information in one’s spoken or preferred language and participate in and benefit from public services offered by a State Agency at no cost to the individual with LEP. Meaningful Language Access must not be unreasonably restricted, delayed, or inferior compared to access provided to Individuals with LEP.
- **Multilingual Staff:** staff who possess a demonstrated proficiency in one or more languages other than English and are formally assigned and fairly compensated to either provide Language Assistance Services such as Interpretation and/or translation to Individuals with LEP or serve in a policy, resource, or advisory role to provide their cultural and linguistic expertise.
- **Plain Language:** a style of communication that aims to make written or spoken information easy to understand for a broad audience. The Plain Language Act defines Plain Language as “clear, concise, well organized, and follows other best practices

appropriate to the subject or field and intended audience.”¹ Language intended for public consumption avoids non-essential information and complex phrasing, highlights essential information, avoids the use of technical terms and industry jargon, and simplifies complex information.

- **State Agency:** any State of Illinois agency, board, or commission directly responsible to the Governor that provides direct or indirect services, resources, programs, information, data, policies, instructions, or activities to the public, Funded Entities, and staff.
- **Tier I State Agency:** State Agencies that have primary responsibilities that involve providing direct or indirect services and information to the public and have a relatively large staff, budget, and operational scope.
- **Tier II State Agency:** State Agencies that have responsibilities that involve providing direct or indirect services and information to the public and/or have a relatively medium-to-small staff, budget, and operational scope.
- **Tier III State Agency:** State Agencies that do not have primary responsibilities that involve providing direct or indirect services and information to the public, though they may provide information to the public.
- **Translation:** the conversion of written text from one language (source language) into an equivalent written text in another language (target language) to convey the intent and essential meaning of the source text.
- **Vital Documents:** public-facing written materials, whether in paper or electronic format, made available on any platform, that are created, issued, or distributed by a State Agency to communicate with the public. These documents contain information that affects an individual’s access to, retention of, termination of, or exclusion from program services or benefits; inform the public about rights, responsibilities, rules, services, resources, or events; allow individuals to apply for or participate in programs or benefits; notify individuals about their eligibility, participation, or benefits; and provide instruction, guidance, or complaint submission processes.

SECTION 2: NEEDS ASSESSMENT

Illinois is home to a diverse population with cultural and linguistic backgrounds from around the world. To support the Commission in determining and prioritizing Language Assistance Services, the LAP includes a needs assessment that identifies the languages other than English spoken by individuals served or likely to be served by the Commission.

A Four-Factor Analysis is used to determine the language services the Commission needs to prioritize to meet the needs of Individuals with LEP. The Four-Factor Analysis is a tool

¹ See Public Law 111-274. 124 Stat. 2861 <https://www.gpo.gov/fdsys/pkg/PLAW-111publ274/pdf/PLAW-111publ274.pdf>.

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designed to help recipients of federal financial assistance conduct an individualized assessment that considers the following four factors:²

- Factor 1: Data collection and analysis of the Individuals with LEP
- Factor 2: Data collection and analysis of languages encountered
- Factor 3: Services provided to the public and/or prospective Individuals with LEP
- Factor 4: Budget and available resources

Data provided in this section illustrates the number of Individuals with LEP who may need language services, as well as the types of services the Commission provides that the public and potential Individuals with LEP would access.

FACTOR 1

Overview of Standard

This factor assesses the number or proportion of Individuals with LEP that could be served by or could encounter the Commission's services.

The Language Equity and Access Act requires each State Agency to conduct an individualized assessment to determine the adequacy of its LAP. This assessment must consider the frequency with which Individuals with LEP come in contact with services, programs, or activities provided by the agency. In addition, the Act directs ONA and any other relevant agencies, to prepare a Language Needs Assessment Report based on available U.S. Census data. This report must identify languages spoken throughout the state and examine the geographic patterns and trend data to inform the development of agency LAPs.

The LAP must include a description of the LEP populations served, the policy and programmatic actions taken to ensure Meaningful Language Access, and the metrics used to measure compliance with the Act. State Agencies must regularly monitor demographic population changes to ensure language services adequately reflect actual needs, particularly for services frequently utilized by the public.

This analysis helps ensure that the Commission is positioned to adequately identify underserved LEP populations and emerging language needs and address any barriers that may prevent access to critical public services.

² See Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (67 FR 41455) (2002). <https://www.federalregister.gov/documents/2002/06/18/02-15207/guidance-to-federal-financial-assistance-recipients-regarding-title-vi-prohibition-against-national>

Current Systems and Practices

In 2025, the Commission is using the following findings from a demographic analysis³ conducted by the University of Illinois Chicago in partnership with ONA on the state’s Individuals with LEP:

- In Illinois, 1.0 million residents speak English less than “very well” and speak a language other than English at home. Both federal and state policies recognize that these individuals have a right to equitable access to government services, which includes information and communication in a language they understand.
- Eleven languages have more than 10,000 limited-English speakers in Illinois, including:

Largest Language Groups and Largest Limited-English Language Groups in Illinois: 2018-2022			
Largest Language Groups		Largest Limited-English Language Groups	
	# of Speakers		# of Speakers
Spanish	1,638,222	Spanish	616,760
Polish	169,308	Polish	73,843
Chinese*	106,399	Chinese*	51,494
Filipino, Tagalog	86,051	Filipino, Tagalog	23,198
Arabic	67,017	Arabic	20,342
Urdu	56,122	Korean	20,165
Gujarati	50,196	Gujarati	18,762
Hindi	47,274	Russian	17,649
Russian	44,211	Vietnamese	13,966
Korean	39,624	Urdu	13,893
French	36,728	Ukrainian, Ruthenian, Little Russian	11,817

- The predominant language other than English in many counties may be Spanish, but closer examination of the most common non-English languages shows that immigrants and migrants come to Illinois from many places. For example, in Champaign County, the top language spoken in limited English households is Mandarin, and, in Macon County, it is Tagalog. Additionally, in Cass and Knox County, the second language is French/Haitian/Cajun. In Madison County, it is Tagalog. In Cook, DuPage, and Kane County, the second language is Slavic.

³ See Rob Paral, “Language Needs Assessment Report, Office of New Americans, Office of the Governor of Illinois, Great Cities Institute at the University of Illinois Chicago (2025), <https://arcg.is/1Py4n0>.

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- A statewide map of persons who do not speak English very well shows that the largest numbers of such persons are in the metro Chicago area. Nevertheless, significant numbers of up to 9,000 are located in townships across the state and are often located near metro areas such as St. Louis, Springfield, Champaign, and Rock Island. There are also notable populations in relatively rural townships in, Douglas, and Union County.
- After years of decline, the number of Illinois residents who do not speak English very well is on the rise. In examining ten years from 2014 to 2023, this population fell by 79,000 persons between 2014 and 2019. But since a low of 1.0 million in 2019, the most recent data, for the year 2023, shows about 1,082,000 persons, for a gain of some 82,000.

FACTOR 2

Overview of Standard

This factor assesses the frequency with which Individuals with LEP encounter the Commission's services, programs, or activities.

The Language Equity and Access Act requires State Agencies to conduct an individualized assessment as part of its LAP that considers the frequency with which Individuals with LEP come into contact with the services, programs, and activities provided by the agency. This analysis supports the Commission's ability to identify Language Access needs and ensure Meaningful Language Access.

In order to ensure that all encounters with Individuals with LEP across programs and services are collected in a comprehensive and ongoing manner, the Commission will take the following action:

- Collect data on encounters with Individuals with LEP that take place in person, by telephone, via email, and through online platforms.
- Track the languages encounters and types of Language Assistance Services requested and/or provided during those encounters; and
- Conduct regular assessments and identify high-volume languages and the most frequently requested or needed Language Assistance Services to ensure Meaningful Language Access that is accurate, timely, and effective at no cost to Individuals with LEP.

Current Systems and Practices

The Commission can identify Individuals with LEP during their initial interaction with the Commission. Because of the Commission's role, it does not provide a direct service to the public and instead receives cases after the Department investigates a charge of discrimination. Therefore, a person's initial interaction with the Commission primarily occurs in one of the following ways: (1) a phone call, email, or in-person visit requesting information about the Commission or its processes; (2) the filing of a request for review of the Department's decision to dismiss a charge; (3) the filing of a complaint alleging civil rights violations; or (4) an appearance before an Administrative Law Judge at the initial hearing on a filed complaint. In Fiscal Year 2024, the Commission received 1,601 phone inquiries, 247 in-person visits, 260 requests for review, and 107 complaints.

A member of the Commission's staff tracks each phone call, electronic communication, or in-person interaction with Individuals with LEP, including languages spoken. Additionally, the Commission's staff uses its case management system to track Individuals with LEP involved in a case and what Language Assistance Services might be needed. Such data collection informs how the Commission can better serve its customers by keeping up to date with what languages might need Translation or Interpretation services. The LAC will conduct a monthly review of this data to determine if any changes to the Commission's approach are required,

In Fiscal Year 2026, the Commission will continue to collect data on initial interactions to determine the number or proportion of Individuals with LEP who interact with the Commission. During an initial interaction, the Commission will make reasonable efforts to conduct or arrange for an assessment of a person's need for Language Assistance Services. The language data collected from initial interactions will allow the Commission to determine the frequency in which Individuals with LEP come in contact with the Commission and identify the most requested languages other than English.

FACTOR 3

Overview of Standard

This factor assesses the nature and importance of the programs, activities, or services provided by the Commission.

The Language Equity and Access Act requires State Agencies to implement an individualized assessment as part of their LAP that includes the nature and importance of the services, programs, or activities provided by the State Agency.

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To ensure Meaningful Language Access to critical and urgent information and services, the Commission will outline procedures for prioritizing language assistance for vital and urgent information and activities. The Commission will review all services and information and will prioritize language assistance for programs, activities, services, or information that, if not understood by Individuals with LEP, could have immediate and/or severe impacts.

Current Systems and Practices

The Commission is a Tier 2 State Agency that has statewide jurisdiction via the Illinois Human Rights Act. The Illinois Human Rights Act declares that it is the public policy of the state to: (1) secure for all individuals freedom from unlawful discrimination; (2) maintain the personal dignity of all people in Illinois; (3) guarantee certain rights established by the Illinois Constitution; (4) promote equal opportunity and affirmative actions; and (5) protect against unfounded charges of unlawful discrimination. The Act prohibits discrimination against a person because of their age (40+), ancestry, arrest record (in employment and real estate transactions), citizenship status (in employment), color, conviction record (in employment), disability (physical, mental, and association with a person with a disability), familial status (in real estate transactions), family responsibilities (in employment), gender identity, immigration status (in real estate transactions), marital status, military status, national origin, order of protection status, pregnancy, race (including traits associated with race like hair texture and protective hairstyles), religion, reproductive health decisions, sex, sexual orientation, source of income (in real estate transactions), unfavorable military discharge, and work authorization status (in employment).

The Commission recognizes that many of these protected classes include high numbers of persons with a limited ability to read, speak, write, or understand English. Therefore, ensuring that all the Commission's customers enjoy Meaningful Language Access is vital to the Commission's role in protecting the civil rights of Illinois residents. The Commission is dedicated to assessing the language needs of its customers at first interaction and advising customers of the Commission's Language Access Services and how to utilize them.

FACTOR 4

Overview of Standard

This factor assesses the resources currently available to the Commission, as well as the cost associated with providing Language Assistance Services.

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The Language Equity and Access Act requires State Agencies to review the resources available and the cost of Language Assistance Services. It is best practice for the budget for Language Assistance Services to be based on programmatic needs and the top five languages prioritized for services. Additionally, a strategic practice is to outline the costs associated with current Language Assistance Services, as well as assess the level of resources, costs, and capacity to implement and support additional language services over time. Based on the assessment of resources, the Commission will identify efforts to support cost-savings and cost-sharing when/if needed. Such efforts may include sharing resources with other departments and agencies and/or using technology to support the delivery of Language Assistance Services.

Current Systems and Practices

The Commission will assess its resources and costs for Language Assistance Services on a regular basis. The Commission reviews its overall budget at bimonthly meetings and assesses the resources and costs for Language Assistance Services in its budget review. The Commission is committed to ensuring continuation of its current Language Assistance Services as well as expanding its services when possible, including the Translation of Vital Documents into more languages.

SECTION 3: STAFFING AND COORDINATION

Overview of Standard

The Illinois Language Equity and Access Act outlines the requirements for each State Agency to designate a LAC who is responsible for overseeing the development and implementation of a LAP. The LAC will support ongoing compliance by partnering with ONA to ensure coordinated implementation and compliance with language access requirements.

Current Systems and Practices

To ensure adequate staffing to support the development, management, and oversight of Language Assistance Services, and consistent with the Language Equity and Access Act's directive to ensure adequate staffing of Multilingual Staff, the Commission will establish internal roles to implement its LAP. The Language Equity and Access Act outlines the requirements for each State Agency to designate a LAC who is responsible for overseeing the development and implementation of the LAP. The LAC will support ongoing compliance by partnering with ONA to ensure coordinated implementation and compliance with Language Access requirements.

SECTION 4: LANGUAGE ASSISTANCE SERVICES

The Commission is committed to taking reasonable steps to ensure Meaningful Language Access for Individuals with LEP who utilize the Commission’s services. This section outlines the types of language assistance the Commission currently provides as well as the services the Commission plans to provide to support Meaningful Language Access for Individuals with LEP. The Language Assistance Services include oral Interpretation services, virtual Interpretation services, in-language assistance with Multilingual Staff, print and online Translation services, and the development of other multilingual media content.

This section also outlines the roles and responsibilities of the Commission’s staff, including LACs and LALs, who are responsible for monitoring and ensuring the implementation of Language Assistance Services across the Commission.

LANGUAGE NEED IDENTIFICATION

Overview of Standard

The LAP requires State Agencies to develop clear policy and programmatic actions to ensure Meaningful Language Access. It is national Language Access best practice for State Agencies to utilize language-need identification materials, such as an “I Speak” language identification card or poster, to assist with the identification of the languages requested by Individuals with LEP. These tools support Meaningful Language Access by enabling Individuals with LEP to indicate their language needs, consistent with a State Agency’s obligation to ensure accurate, timely, and effective communication.

Current Systems and Practices

The Commission will notify Individuals with LEP of available Language Assistance Services during their initial interaction with the Commission, whether in person or by telephone, email, or other virtual mediums. Because the Commission does not provide a direct service to the public and instead receives cases after the Department investigates a charge of discrimination, notifying Individuals with LEP of available Language Assistance Services upon their first interaction with the Commission in whatever form it takes is vital. The Commission will provide Interpretation services as necessary and translate Vital Documents into the most frequently encountered languages. The Commission will also provide notice of available Language Assistance Services through outreach initiatives, social media, and web page

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presence. These Language Assistance Services will be delivered by competent staff, interpreters, or translators at no cost to Individuals with LEP.

The Commission determines whether a person requires Language Assistance Services in the following ways:

- Use of an “I Speak” language identification card or poster;
- Engagement by Multilingual Staff or a qualified in-person or remote interpreter to identify a person’s primary language;
- Voluntary self-identification by the person or their companion; or
- Affirmative inquiry regarding the primary language of the person if they have self-identified as needing Language Assistance Services.

QUALIFIED INTERPRETERS, MULTILINGUAL STAFF, AND TRANSLATION OF VITAL DOCUMENTS

Overview of Standard

The Language Equity and Access Act requires State Agencies to ensure Individuals with LEP have access to competent, timely, and effective Interpretation and Translation services when interacting with staff, programs, and services.

Current Systems and Practices

Multilingual Staff. The Commission has Multilingual Staff available to assist Individuals with LEP either in person, by telephone, or by email. The Multilingual Staff can communicate in Spanish to explain basic procedures but cannot provide legal advice, suggest a course of action, or predict the outcome of a case. The Multilingual Staff consists of an Office Coordinator, Office Administrator, and two Administrative Assistants and comprises 17% of the overall Commission staff (4 of 23 positions).

Professional Interpreters. Under Section 8-102(L) of the Illinois Human Rights Act, the Commission shall appoint at the expense of the Commission a qualified interpreter whenever an Individual with LEP is a party or witness in proceedings before the Commission. 775 ILCS 5/8-102(L). In Fiscal Year 2024, the Commission appointed a Spanish interpreter to Individuals with LEP in two judicial settlement conferences and one public hearing for a total of 30 hours of professional Interpretation services.

Translation Services. The Commission will identify and translate its Vital Documents into the most frequently encountered languages. The Commission will analyze the language data

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collected in Fiscal Year 2026 to help identify and prioritize the appropriate languages for Translation of Vital Documents in the future.

Telephonic Interpretation. The Commission can access Telephonic Interpretation services through Propio Language Services. The staff can connect with professional interpreters in over 300 languages to answer routine requests for information and support understanding during status calls before Administrative Law Judges.

Vital Documents. As outlined above, the Commission will identify and translate its Vital Documents into the most frequently encountered languages so that parties to cases at the Commission can be aware of its rules and procedures. The Commission initially identified Spanish, Polish, Chinese, Hindi, and Tagalog as the five most frequently encountered languages. The Commission will analyze the language data collected in Fiscal Year 2026 to help identify and prioritize the appropriate languages for Translation of Vital Documents in the future.

Document Name	Spanish	Polish	Chinese	Hindi	Tagalog
Commission Filing Procedures	✓				
Standing Order for All Cases Filed Before the Administrative Law Section	✓				
Standing Order for Judicial Settlement Conferences	✓				
Checklist for Judicial Settlement Conferences	✓	✓	✓	✓	✓
Frequently Asked Questions About the Request for Review Process					

Contested Cases. Under recent amendments to the [Illinois Administrative Procedure Act](#), 5 ILCS 100/1-1, the Commission will provide a notice to parties at the start of all contested cases written in English, Arabic, Cantonese, Gujarati, Korean, Mandarin, Polish, Russian, Spanish, Tagalog, Urdu, Ukrainian, and Vietnamese that notifies the parties of the ability to request interpretive assistance to participate in or understand hearings and to receive Language Assistance Services for translating the contents of the notice of such hearing. A

request to receive a written or sight Translation of the notice must be made within seven days of service of the notice.

DEVELOPMENT AND DISTRIBUTION OF MULTILINGUAL CONTENT IN OTHER FORMATS

Overview of Standard

The Language Equity and Access Act requires State Agencies to take steps to ensure that digital content is accessible to Individuals with LEP. All Translation of public-facing digital content will be completed in a manner that ensures accuracy, completeness, and timeliness consistent with the Language Equity and Access Act's requirement for competent Translation services. The selection of languages for Translation will be guided by current demographic data, the state's Language Needs Assessment Report, and thresholds outlined in the Language Equity and Access Act.

Current Systems and Practices

The Commission prioritizes including multilingual content on its website, such as by providing options for the entire website to be translated into Spanish, Polish, Chinese, Hindi, and Tagalog. The Commission's website also provides access to multiple Vital Documents that have been translated into the most frequently encountered languages.

SECTION 5: NOTIFICATION OF LANGUAGE ASSISTANCE SERVICES

In addition to providing Language Assistance Services, the Commission is committed to notifying the public of Language Assistance Services and providing information on how Language Assistance Services can be requested. Such communication assists Individuals with LEP in understanding the services provided by the Commission, which can increase public trust and confidence.

Overview of Standard

The Language Equity and Access Act requires State Agencies to ensure that the public and Individuals with LEP are informed of the availability of free Interpretation and Translation services and how to request them.

To meet this requirement, the Commission will provide multilingual public notices in various formats—both digital and physical—to promote broad public awareness. All notices will

clearly explain how individuals can request Interpretation or Translation services and will be made available in the most frequently spoken languages identified through demographic analysis and the state's Language Needs Assessment Report.

Current Systems and Practices

The Commission can identify Individuals with LEP during their initial interaction with the Commission. Because of the Commission's role, it does not provide a direct service to the public and instead receives cases after the Department investigates a charge of discrimination. Therefore, a person's initial interaction with the Commission primarily occurs in one of the following ways: (1) a phone call, email, or in-person visit requesting information about the Commission or its processes; (2) the filing of a request for review of the Department's decision to dismiss a charge; (3) the filing of a complaint alleging civil rights violations or (4) an appearance before an Administrative Law Judge at the initial hearing on a filed complaint. In Fiscal Year 2024, the Commission received 1,601 phone inquiries, 247 in-person visits, 260 requests for review, and 107 complaints.

During an initial interaction, the Commission will make reasonable efforts to conduct or arrange for an assessment of a person's need for Language Assistance Services. The language data collected from initial interactions will allow the Commission to determine the frequency in which Individuals with LEP come in contact with the Commission and identify the most requested languages other than English.

The Commission will utilize various methods and networks to ensure that Individuals with LEP and groups who work with Individuals with LEP are aware that the Commission provides Language Assistance Services to them at no cost. The Commission's website and social media will highlight the availability of information materials in languages other than English. For example, the Commission's website provides a copy of the Commission's filing procedures in Spanish, which can be found under the "Rules, Forms, & Filing Procedures" tab. Additionally, the Commission's website includes a drop-down box that allows anyone visiting the website to translate its contents into Spanish, Polish, Chinese, Hindi, and Tagalog. The Commission's outreach materials will also inform Individuals with LEP about the Language Assistance Services that are available at no cost.

SECTION 6: LANGUAGE ACCESS TRAINING

The Commission is committed to ongoing development and training on Language Assistance Services to maintain well-trained staff who interact with or may interact with Individuals with

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LEP. Staff will receive ongoing professional development and training on Language Assistance Services policies, procedures, and responsibilities. This section outlines the type of Language Access training that the Commission will provide to staff who interact with or may interact with Individuals with LEP. This section also identifies the timing, frequency, and delivery methods for how training shall be implemented across the Commission.

Overview of Standard

The Language Equity and Access Act requires that State Agencies develop and implement an ongoing employee development and training strategy to maintain well-trained Multilingual Staff and general staff. This ensures that the Commission is equipped to deliver effective Language Assistance Services.

Current Systems and Practices

The Commission will provide training as necessary to ensure that its staff understands the policies and procedures for implementing this LAP. This training helps ensure that all staff are aware of the options for identifying Individuals with LEP, the language data collected from initial interactions, the available Language Assistance Services, the procedures to access these services, and the responsibilities of the LAC. Training for new hires will consist of a detailed explanation of the Commission's policies and procedures for implementing this LAP. The Commission will conduct additional training as needed, such as when new language needs are assessed.

SECTION 7: CONCERN RESOLUTION PROCESS

This section highlights the need for allowing public feedback on the quality, accessibility, and effectiveness of Language Assistance Services. The Commission will develop and make publicly available a multilingual concern resolution form, collect and log complaints submitted by Individuals with LEP, and promptly investigate and address each concern in a timely manner. Additionally, this section describes how the Commission will track the resolution status of complaints to ensure transparency and accountability and coordinate with ONA when appropriate to support compliance and continuous improvement.

Overview of Standard

The Language Equity and Access Act requires State Agencies to establish and make publicly available a complaint and review process for Individuals with LEP and members of the public

to submit concerns related to access to Language Assistance Services. Complaints that are not resolved in a timely or satisfactory manner may be referred to ONA for further review

Current Systems and Practices

The Commission will implement a complaint process for any Individuals with LEP who are dissatisfied with the Commission's Language Assistance Services. Any person who believes that they have been denied the benefits of this LAP may submit a complaint in writing to the Commission's LAC by email to HRC.News@illinois.gov or by mail to Illinois Human Rights Commission, Michael J. Bilandic Building, 160 N. LaSalle Street, Suite N-1000, Chicago, IL 60601. After a complaint is received, the LAC is responsible for investigating and responding to the complaint within 5 business days. If a person disagrees with the LAC's response to the complaint or does not receive a response to the complaint within 5 business days, they may request that ONA review the complaint by sending an email to GOV.NewAmericans@illinois.gov.

SECTION 8: MONITORING, EVALUATION, AND REPORTING

This section highlights the procedures that the Commission will implement to assess compliance with the Language Equity and Access Act and evaluate the effectiveness of this LAP and its action items. The section outlines current practices and procedures for monitoring and collecting Language Access data, analyzing language use and assistance needs, procedures for collecting and participating in community engagement/community feedback sessions to gather input on improvements to the LAP and Language Assistance Services, and evaluating the quality of Language Assistance Services offered by the Commission.

Overview of Standard

In accordance with the Language Equity and Access Act, the Commission will coordinate with ONA to review and monitor the implementation of its LAP and ensure ongoing compliance.

The Commission will conduct an individualized assessment of language assistance needs and patterns of language use on an ongoing basis and incorporate updated data and performance metrics into each new iteration of the LAP. The Commission will use this information to evaluate the effectiveness of current policies and practices and inform continuous improvement of Language Access Services.

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The LAP will include the ongoing review of statewide and Commission-specific data on LEP populations, including demographic shifts and the identification of new or emerging language needs, as outlined in the state's Language Needs Assessment Report. The monitoring and evaluation plan will also track progress on the implementation of LAP goals, review expenditures related to Language Assistance Services, and assess whether projected changes in costs require budget adjustments or modifications to service delivery methods.

Current Systems and Practices

The Commission will appoint a LAC responsible for implementing and overseeing this LAP. The LAC will conduct staff training, perform self-assessments, maintain accessibility of internal Language Assistance Services, and provide notice of available Language Assistance Services through community engagement and outreach.

SECTION 9: RESOURCES

- Illinois Statewide Coordination Plan Draft
- Illinois Language Access Toolkit

SECTION 10: APPENDIX