

Illinois Criminal Justice Information Authority

Language Access Plan

I. INTRODUCTION AND PURPOSE

Equal access to programs, services, and activities offered by the State of Illinois is fundamental to the trust and confidence of its residents. Language can be a significant barrier to accessing benefits, services, exercising basic rights, and complying with mandated responsibilities. It is for that reason that language services for individuals who are limited English proficiency (“LEP”), who are blind or sight-impaired, or who are deaf or hard of hearing are essential to ensure that they can fully access the programs, services, and activities offered by the State. Moreover, State agencies have an independent interest in ensuring the integrity of communications with LEP individuals as well as deaf and hard of hearing persons or blind/sight-impaired persons. It is for this reason that the Illinois Criminal Justice Information Authority (“ICJIA”) is committed to complying with all civil rights laws to ensure that LEP individuals have meaningful access to all state programs, services, and activities.

The purpose of this Language Access Plan (“LAP”) is to ensure that ICJIA takes reasonable steps to provide LEP individuals with meaningful and universal access to ICJIA services, programs, and activities by all persons, including those who self-identify as an LEP individual or have a preference for information and materials in a language other than English. While the LAP allows for a large degree of flexibility for offering language assistance services, it also provides baseline standards to ensure agency-wide consistency with applicable federal and state laws so that all Illinois residents can expect language access services regardless of where they live within the state’s borders.

This LAP proposes a comprehensive and systematic approach to expand language access at all points of contact between LEP individuals and ICJIA staff. The overall goal is to provide a greater level of skill and resources at the most complex and important areas of service such as outreach events, public meetings, or grant monitoring, while more flexible services can be provided at other points of contact. The LAP also advocates for the use of cost-effective methods to enhance language access services such as current State contracts for translation and language line services and the use of technological tools.

II. DEFINITIONS

For purposes of this Language Access Plan, the following terms are defined as follows:

Bilingual Person: A person who is fluent in two languages and can conduct the business of ICJIA in either of those languages. This is to be distinguished from an individual who is merely proficient in more than one language. A person who is proficient in a language may, for example, be able to greet a person with limited English language skills in that person’s primary language but not conduct ICJIA business in that language.

External Stakeholder: A person who is not an ICJIA employee and who has contact with, or is seeking information or services from, ICJIA programs, services, and/or activities. External stakeholders may include, without limitations, members of the public, businesses, nonprofit organizations, faith-based organizations, community organizations, contractors, vendors, local units of government, grantees, and affiliates of grantees.

Interpretation: Interpretation involves the immediate communication of meaning from one language (the source language) into another (the target language). An interpreter conveys meaning orally. A successful interpretation is one that faithfully and accurately conveys the meaning of the source language orally, reflecting the style, register, and cultural context of the source message, without omissions, additions, or embellishments on the part of the interpreter.

Language Access Coordinator (“LAC”): This position will be held by ICJIA General Counsel or designee. The LAC will be responsible for: (i) developing and implementing language assistance policies, procedures, and protocols; (ii) monitoring and evaluating the LAP; (iii) conducting staff training; and (iv) establishing outreach and partnerships with community organizations that work with the LEP population.

Language Assistance Services: Oral and written language services are needed to enable LEP individuals to communicate effectively with ICJIA staff and to gain access to, and on an equal opportunity to participate fully in the programs, services, and activities administered by ICJIA.

Limited English Proficient (LEP) Person: A person who does not speak English as their primary language and/or who has a limited ability to speak, write, or understand English. LEP individuals may be competent in English for certain types of communication (e.g. speaking or understanding) but still, be LEP for other purposes (e.g. reading or writing). These individuals may be entitled to language assistance services to a particular type of service, benefit, or encounter. The term “LEP” also includes people who reported to the U.S. Census that they speak English less than well, not well, or not at all as well as deaf, hard of hearing LEP individuals, or individuals who are blind or sight-impaired and are not proficient in English.

Meaningful Access: Language assistance that results in accurate, timely, and effective communication and that is available at no cost to the LEP individual. For LEP persons, meaningful access denotes access that is not significantly restricted, delayed, or inferior as compared to service, activity, or program access provided to English proficient persons.

Primary or Preferred Language: The language in which a person communicates most effectively.

Sign Language Interpreter: This means an individual who is qualified to facilitate communication between or among ICJIA staff and a deaf, hard of hearing LEP individual using sign language or other manual or oral representation of a spoken language.

Translation: This is the process of rendering a written document (printed or in digital form) from one language into another. The following skills are central to written translation: the ability to comprehend written text in one language (reading skills), and the ability to produce a comparable rendition in written form in a second language (writing skills) into another.

Vital Documents: This refers to written materials (printed or digital form) that contain programs, limited English proficient populations, or both. Examples include signs, outreach materials, and notices about the availability of interpreter services, legal documents (e.g., conflict of interest policy and forms, complaint forms), and other documents deemed critical by relevant ICJIA personnel.

III. GENERAL PRINCIPLES IN PROVIDING LANGUAGE ASSISTANCE SERVICES

Title VI of the Civil Rights Act of 1964, and its implementing regulations, stipulates that no individual shall, “on the grounds of race, color or national origin, be excluded from participation in, be denied the

benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.” Under this law, federally assisted programs must ensure their programs, services, and activities are equally accessible to LEP persons. Similarly, the Americans with Disabilities Act of 1990 (ADA), and amendments, make it unlawful to discriminate against a qualified individual with a disability in State and local government services, public accommodations, transportation, and telecommunications. Under the ADA, all governmental entities are required to provide reasonable accommodations to individuals with disabilities, including persons who are deaf and hard of hearing or who are blind/sight-impaired.

The Illinois Civil Rights Act of 2003 prohibits State agencies from utilizing criteria or administration methods that have a disparate impact based on race or national origin, regardless of intent. Lastly, on December 7, 2020, Governor Pritzker directed state agencies to conduct a self-assessment and develop language action plans that were complied with state and federal regulations. Therefore, to ensure LEP individuals are not denied access to state and federal benefits due to national origin, ICJIA will identify steps and procedures to provide LEP individuals within our jurisdiction equal access to ICJIA, its programs, services, and activities.

IV. LANGUAGE ACCESS COORDINATOR (LAC)

ICJIA’s LAC role will be filled each year by its General Counsel or their designee. The name and contact information for the LAC will be posted on ICJIA’s website as indicated below, along with other LEP resources. The LAC will work with representatives from other ICJIA departments, when necessary, such as its Federal and State Grants Unit, IT, Human Resources and Research and Development to comprehensively gather and review information related to how ICJIA provides services to LEP individuals in order to most effectively create, advise and oversee policy directives, data collection, and develop and modify the LAP to meet the needs of the LEP’s that come into contact with ICJIA. The LAC will also: (i) develop and implement language assistance policies, procedures, and protocols; (ii) monitor and evaluate the LAP; (iii) conduct staff training; and (iv) establish partnerships with community organizations that work with the LEP population. The LAC will also update LAP data and content every fiscal year.

The LAC is: Scott Risolute, Deputy General Counsel, and can be reached by email at CJA.LAPRequests@illinois.gov.

V. LANGUAGE ASSISTANCE RESOURCES AND PROCEDURES

ICJIA recognizes that LEP individuals may have a limited ability to read, write, speak, or understand English. It is also important to note that everyone may be competent in one or some types of communication (e.g. speaking) but be limited in others (e.g. reading or writing). As such, LEP designations are highly context-specific because an LEP individual may possess sufficient English language skills to function in one setting but insufficient for another. In addition, interpretation and/or translation are complex tasks that combine several abilities beyond language competence to enable the delivery of professional language assistance services.

ICJIA will provide a mix of appropriate language assistance services, based on the needs of the LEP individual and the circumstances of the interaction, to provide reasonable and meaningful results for LEP individuals. The services will be a tiered array of programs to provide interpretation and translation services for all persons interacting with ICJIA about its programs, services, and activities.

ICJIA, through various contracted vendors, will provide professional interpretation and translation services free of charge and promptly to LEP persons if requested.

A. Point of First Contact and Identifying LEP Individuals

ICJIA staff should, at the point of first contact with an LEP individual, make reasonable efforts to conduct or arrange for an initial assessment of the need for language assistance services. Staff should also make reasonable efforts to obtain such services if they are needed to effectively communicate with the individual.

ICJIA staff should avoid making assumptions about an individual's primary language. It is the LEP individual's right to request language assistance services. The fact that an individual for whom English is a second language knows some English should not prohibit that individual from being allowed to have an interpreter or access translated written materials.

ICJIA personnel can determine whether a person needs language assistance services in several ways:

- Self-identification by the LEP individual, or by their relative, friend, or another companion;
- Inquiring as to the primary language of the individual if they have self-identified as needing language assistance services; and or
- Asking a qualified interpreter to verify an individual's primary language.

To avoid any misinterpretation, ICJIA staff should never ask another ICJIA employee or unqualified third parties to determine the language of an LEP person. The exception to this is when the LEP person brings someone they trust with them to act as their interpreter, such as a family member. ICJIA's plan for engaging with individuals with LEP in-person, over the telephone, and at public and virtual events is described below, followed by website resources available to individuals with LEP.

B. In-Person Visits

When ICJIA staff members engage with an LEP individual in person at ICJIA's office, or at site visits or public meetings, the staff member will use language identification cards to identify the person's language need. ICJIA staff who may reasonably expect to have contact with LEP persons will keep a copy of the "I Speak" language identification materials readily accessible, including taking it to site visits. See Appendix B for a copy of the "I Speak" language identification guide. Once the LEP person's preferred language is identified, the staff member shall do one of the following, dependent upon the resources available at the location of the in-person meeting:

- Enlist the assistance of a previously screened and trained bilingual staff member to serve as an interpreter for the LEP individual.
- If bilingual staff is not available, or unable to interpret for any reason, the ICJIA staff member can contact ICJIA's contracted interpreter service. The contact information for the current Interpretation Contracted Vendors may be found in Appendix C and will be available to all staff.
- Some LEP persons may be accompanied by a family member or a trusted companion who can serve as an interpreter. In this situation:
 - ICJIA staff should make the LEP individual aware that they have the option of having ICJIA provide language assistance services, without charge.
 - While a family member or trusted companion may be able to assist in some circumstances, if the nature of the communication with the LEP involves complex matters/terminology, ICJIA staff should offer professional language assistance services and explain to the LEP individual the benefit of using the professional interpretation services.

Any questions or issues relating to in-person language assistance services should be referred to ICJIA's LAC or designee at CJA.LAPRequests@illinois.gov.

C. Telephonic Contacts

The goal of ICJIA is to ensure that all departmental telephonic communication is accessible to all populations and to comply with federal and state language assistance laws and regulations.

If ICJIA staff receive a telephone call and are able to identify the language spoken by the caller, staff will take the following steps:

- Enlist the assistance of a previously screened and trained bilingual staff member who speaks the same language as the caller to serve as an interpreter for the LEP individual by inviting them to join the call through the phone's conference feature.
- If bilingual staff is not available, or unable to interpret for any reason, the ICJIA staff member can contact ICJIA's contracted interpreter service. The contact information for the current Interpretation Contracted Vendors may be found in Appendix C and will be available to all staff.

If ICJIA staff receive a telephone call and are unable to identify the language spoken by the caller, staff will take the following actions:

- Access the contracted telephone interpretation services vendor to seek assistance in identifying the caller's primary language by using their phone's conference feature to place the LEP individual on hold while contacting the contracted vendor. ICJIA staff should provide a summary of what they wish to accomplish and provide any special instructions before adding the LEP person onto the call.

Once the LEP individual's language is identified can choose to proceed with interpretation through the contracted provider service or seek the assistance of a previously screened and trained bilingual staff member.

Any questions or issues relating to in-person language assistance services should be referred to ICJIA's LAC or designee at CJA.LAPRequests@illinois.gov.

D. ICJIA Public Meetings and Onsite Events

When ICJIA is holding a public meeting or hosting an onsite event, all residents of Illinois, including LEP persons, affected by the event topic must have equal access to important ICJIA information. To ensure equal access by all prospective attendees, ICJIA staff coordinating the public meeting or event, in conjunction with the LAC, will consider accessibility concerns when selecting a site and follow these steps:

- All public meeting or onsite event notices should include explicit information about the availability of interpretation services. The following sample statements may be included in event public announcements and translated into the languages representing most of the anticipated attendee pool:
 - To request an accommodation or language assistance services to fully participate in this activity, [please contact [NAME OF ICJIA STAFF EVENT COORDINATOR] at [EMAIL/PHONE NUMBER]] or [please send your request to CJA.LAPRequests@illinois.gov]. To make sure we can provide you with the appropriate accommodation, please make your request at least five (5) business days in advance of the scheduled activity.

- If any accommodations, including language assistance services, are needed, [please contact [NAME OF ICJIA STAFF EVENT COORDINATOR] at [EMAIL/PHONE NUMBER]] or [please send your request to CJA.LAPRequests@illinois.gov]. Requests should be made as soon as possible but at least five (5) business days before the scheduled activity.
- To ensure prospective attendees who may require language assistance services have enough time to make such a request, ICJIA staff will make every reasonable effort to release announcements for all public meetings or onsite events at least seven (7) to ten (10) business days ahead of the event date. Prospective attendees should be informed that they must request an accommodation or language assistance services at least five (5) business days before the event.
 - If a request for an accommodation, including language assistance services, is received, the responsible ICJIA personnel should contact the LAC or designee immediately (but no later than 2 business days before the scheduled event) to determine the best method of providing the requested services. The LAC will determine if a contracted interpreter will need to be engaged to interpret at the event or if a previously screened and trained ICJIA staff member who speaks the requester’s language will be able to perform the necessary interpretation services.
- If at the time of the activity is being organized the ICJIA event coordinator is aware of the need to have an interpreter present at the event, they should immediately contact the LAC or designee to make appropriate arrangements. For example, if the ICJIA event coordinator is informed that the event will be heavily attended by LEP groups, the ICJIA event coordinator should consult with the LAC or designee to ensure language assistance services are provided, even if no individual request from an LEP person has been received.

Any questions or issues relating to in-person language assistance services should be referred to ICJIA’s LAC or designee at CJA.LAPRequests@illinois.gov.

E. Virtual Events

When planning a virtual event, including a technical assistance webinar, all residents of Illinois, including LEP persons, affected by the event topic must have equal access to important ICJIA information. To ensure equal access by all prospective attendees, ICJIA staff will follow the following steps:

- The staff member responsible for the virtual event, in conjunction with the LAC, will consider accessibility needs including how any needed interpreters will be visible to the prospective attendees on the virtual platform.
- Prospective attendees should be informed that they must request an accommodation or language assistance services at least five (5) business days before the event.
 - The following sample statements may be included in event public announcements and translated into the languages representing most of the anticipated attendee pool:
 - To request an accommodation or language assistance services to fully participate in this activity, [please contact [NAME OF ICJIA STAFF EVENT COORDINATOR] at [EMAIL/PHONE NUMBER]] or [please send your request to CJA.LAPRequests@illinois.gov]. To make sure we can provide you with the appropriate accommodation, please make your request at least five (5) business days in advance of the scheduled activity.

- If any accommodations, including language assistance services, are needed, [please contact [NAME OF ICJIA STAFF EVENT COORDINATOR] at [EMAIL/PHONE NUMBER]] or [please send your request to CJA.LAPRequests@illinois.gov]. Requests should be made as soon as possible but at least five (5) business days before the scheduled activity. Whenever possible the ICJIA event coordinator should make use of features available on the chosen virtual platform. For example, if the virtual platform is Webex, the ICJIA event coordinator may be able to use available features such as setting up an interpreter window, captions, support for screen readers, close-captioning, customized views for deaf, automated transcripts, and high contrast settings for easier viewing.
 - Any staff unfamiliar with interpretation and translation services on their chosen virtual platform will consult with ICJIA’s IT team for direction.
- If an event requires the assistance of an American or Mexican Sign Language interpreter in which written materials will be displayed, the ICJIA event coordinator should make sure to distribute those materials in advance to known LEP persons.

Any questions or issues relating to in-person language assistance services should be referred to ICJIA’s LAC or designee at CJA.LAPRequests@illinois.gov.

F. ICJIA Website

ICJIA Information and Technology staff will maintain a translation widget on ICJIA’s website. This will allow online users to access information remotely in various languages. Upon request or where necessary, authorized ICJIA staff will also be able to upload translated materials to the ICJIA website.

Additionally, ICJIA staff, in consultation with the LAC, shall take reasonable steps to translate its website content and electronic documents that contain vital information about ICJIA’s programs, services, and activities that pertain to LEP individuals. Translations of the web content may include web pages that contain important information intended for the public, such as information about ICJIA’s mission, information about available grants and applying for grants, and information about research articles.

The LAC will work ICJIA’s IT team to identify to identify a location on its website that will inform all LEP groups and individuals about the availability of language assistance services, how to request additional information regarding such services, where to locate already translated documents on the website and how to request the translation of a document, if necessary. Once all LEP-related information is posted on the website, IT will track the online traffic to the language assistance services, access of translated documents and the submission of forms requesting the translation of a specific document not already available. Collected data will be reviewed by the LAC to determine how to improve its services to LEP individuals.

Any questions or issues relating to in-person language assistance services should be referred to ICJIA’s LAC or designee at CJA.LAPRequests@illinois.gov.

G. Document Translation Services

To ensure equal access to ICJIA’s programs, services, and activities, it may be necessary to have written materials translated into non-English languages when it is determined that the program, service or activity will be of interest to LEP individuals. The translation of documents ICJIA deems as “vital” is particularly important where a significant number of the intended target recipients may be LEP individuals. Determination of vital documents for translation shall be made by the head of each department, in consultation with the LAC.

ICJIA will provide written translation of an entire document or short overviews of a document, including but not limited to agendas, public meeting minutes, public meetings/onsite event notices, brochures, flyers, research articles, some grant-related documents, and/or outreach materials.

When an LEP individual requests the translation of written materials, the ICJIA staff member that receives the request should collect the following data from the LEP:

- Document or documents that LEP individuals would like translated, including if they are requesting to have the entire document translated or merely requesting a summary overview;
- The primary language for translated materials; and
- Method of preferred transmission of documents, i.e., mailed, emailed, faxed, etc. as well as the LEP's contact information.

The LEP individual should be informed that the request will be processed according to internal procedures and that it may take up to 14 business days to respond, depending on the volume and nature of the materials.

The request for translation should immediately be forwarded to the LAC or designee. The LAC or designee will work with contracted translation vendors to have materials translated. Upon completion, the information will be forwarded to the LEP individual by either the ICJIA staff member that initiated the request or the LAC. ICJIA staff should always keep a copy of the translated materials provided to the LEP individual.

Depending on the nature of the request, translation software may be used but should not be the sole resource available for translating written information. If a document is deemed to be "vital," it should be translated by a certified translator.

ICJIA recognizes that the translated document is not a legal document and that, for that purpose, will include a disclaimer on all translated written materials that it is providing the translation as a convenience to assist in the understanding of the information contained in the materials. Unless otherwise indicated, the English language version of all translated documents will be the official, legal, and controlling document.

Any questions or issues relating to in-person language assistance services should be referred to **ICJIA's LAC or designee at CJA.LAPRequests@illinois.gov**.

VI. COMPLIANCE AND TRAINING

A. Compliance

ICJIA staff should take reasonable steps to provide language assistance services to LEP individuals when they encounter or have reason to believe that they may encounter LEP individuals. In addition, under the procedures contained in this LAP, ICJIA staff should take reasonable steps to provide appropriate language assistance services upon the request of an LEP individual who wishes to access ICJIA services, activities, and/or programs.

ICJIA staff should refrain from asking opinions of the interpreter or translators and shall not as an interpreter or a translator undertake any role that may conflict with their function as a professional responsible for providing language assistance services. In addition, an interpreter does not make language proficiency assessments to determine the LEP's grasp and understanding of the English language.

To assist in evaluation efforts, each ICJIA staff member will be required to complete the LAP Tracking Form which will collect data regarding the provision of language assistance services, including the number of requests encountered each quarter, the type of language assistance services requested and provided, and the cost of providing the services. A copy of the Tracking Form can be found in Appendix D.

Any questions or issues relating to in-person language assistance services should be referred to ICJIA's LAC or designee at CJA.LAPRequests@illinois.gov.

B. Staff Training

ICJIA staff that interact with the public must be aware of and understand how to assist LEP individuals requesting language services to ensure meaningful access to all ICJIA programs, services, and activities. The LAC will develop a training module for public-facing staff. These staff members will be required to view the training on an annual basis. New staff that will have a public-facing role will do the training as part of their on-boarding process. Training will focus on:

- The importance of offering language assistance services;
- How to effectively and respectfully communicate and interact with LEP individuals;
- ICJIA's policies, procedures, and protocols related to providing language assistance services, including the availability of interpretation and translation services at no cost to the requestor;
- What type of translated information is available to LEP individuals and where it can be found; and
- How staff can assist in tracking data around requests for language assistance services.

VII. OUTREACH AND NOTIFICATION TO THE PUBLIC

It is the goal of ICJIA to increase awareness of the needs and rights of LEP groups among not only ICJIA staff, but also in the community at large. Outreach efforts are instrumental to inform LEP groups about language assistance services for ICJIA programs, services, and activities. Certain language groups may be underrepresented as seeking ICJIA services because they do not know that such language services exist. Outreach and marketing efforts may uncover latent demands for LAP services.

ICJIA will inform LEP persons of the availability of language assistance, free of charge, by providing written notice in languages the LEP persons will understand. Other outreach and marketing efforts may include, without limitations:

- Placing multilingual signs or posters in areas most frequented by LEP persons such as the reception area, public meeting locations, and conference rooms.
- Inclusion of taglines on all ICJIA materials (e.g. NOFOs, research articles, public meeting announcements) indicating that translation services are available.
- Disseminating information about available language assistance services on ICJIA's website.
- Placing outreach and translated vital documents on ICJIA's website.
- Placing public meeting announcements involving ICJIA programs, services, or activities on non-English media outlets.
- Working with community-based organizations and other stakeholders to inform LEP groups of ICJIA's language assistance services.

- Providing statements in public meetings that ICJIA will provide persons requiring language assistance services with appropriate accommodations upon advance notice as outlined in Section IV of this LAP.

VIII. MONITORING AND ASSESSMENT

The LAC will monitor implementation of the LAP on an ongoing basis, revising policies and procedures as may be required periodically. ICJIA shall also review (not less than [annually, biennially]) the overall effectiveness of the LAP. The review shall consider information from the following:

1. Changes in demographics, including include new language groups and changes in the proportion of existing language groups, types of language assistance services, and other needs.
2. Periodic surveys of ICJIA staff about their use of language assistance services, suggestions for improvement, and if the services provided meet the language needs of LEP persons interacting with ICJIA.
3. Frequency of encounters with LEP organizations and/or persons, including tracking utilization rates of the different types of language access services available to ICJIA.
4. Whether existing language services are meeting the needs of the LEP population.
5. Availability of new resources including technology, collaborative partnerships with agencies or organizations, and other mechanisms for ensuring improved access for the LEP population.
6. Whether identified sources for assistance are still available and viable.
7. How well staff understand and have implemented the policies, procedures, and protocols in the LAP.
8. Feedback from the recipients of ICJIA's language assistance services and relevant communities.

Based on the findings of the periodic review, ICJIA shall revise the LAP to ensure its effectiveness in meeting the access and participation needs of the LEP population.

IX. COMPLAINT PROCEDURES

All persons requesting or receiving language assistance services may file a complaint with ICJIA's LAC if they believe they have been denied the benefits outlined in this LAP. LEP groups should be provided notice of their opportunity to file a complaint. Complaints should be filed within [30/60/90] days of the alleged denial of services, using ICJIA's LAC Complaint Form. (See Complaint Form attached as Appendix E).

Completed complaint forms should be sent to the LAC at: OGCreports@illinois.gov

Once the LAC receives the complaint, they will look into the facts surrounding the denial of benefits, as alleged in the complaint by speaking to the relevant people involved such as staff members, interpreters, translators and the LEP complainant, if additional information is needed.

Within ten (10) business days after the complaint is received, the LAC will reply to the complainant in writing with their determination of whether or not the complainant was denied benefits outlined in the LAP and, where necessary, offer an appropriate resolution to the matter.

If the complainant is not satisfied with ICJIA's LAC's reply to their complaint, the LEP may forward the complaint to the Governor's Office of New Americans at gov.newamericans@illinois.gov for review.

APPENDICES

Appendix A: Four Test

Appendix B: “I Speak” Identification Card

Appendix C: Contact Information for Interpretation and Translation Contracted Vendors

Appendix D: Language Assistance Tracking Form

Appendix E: Languages Assistance Services Complaint Form

APPENDIX A

Four-Factor Analysis

The starting point for determining the extent of ICJIA's obligation to provide language assistance services is based on a four-factor analysis. The four-factor analysis, based on guidance issued by the Department of Justice, is intended to assist ICJIA to develop, adopt and implement language assistance services. The four-factor analysis involves an individualized assessment that balances the following four factors:

Factor 1: The number or proportion of LEP persons eligible to be serviced or likely to be encountered by ICJIA.

The purpose of this factor is to determine the number or proportion of people served or likely to be encountered, who, without efforts to remove language barriers, could be excluded from engaging with or understanding the nature of ICJIA programs, services, and activities.

Demographics show that Illinois has a little over one million residents that self-identified as speaking English less than "very well" (Tables in Appendix A). The data demonstrate that native Spanish speakers account for the largest non-English speaking group in Illinois, consisting of 13.6% of the overall population. According to the 2019 American Community Survey, approximately 36.8% of persons that spoke Spanish at home did not speak English very well.

The available demographic data shows that an LEP population exists within Illinois. Although the LEP population is a small fraction of the overall population, all ICJIA programs, benefits, and activities are open to any eligible organization and/or member of the public within the State of Illinois. As such, ICJIA will take necessary and reasonable steps to ensure that it can provide meaningful language assistance to all LEP individuals. Consistent with the State of Illinois designation, ICJIA shall provide language assistance services for the following languages:

- Spanish
- Polish
- Arabic
- Hindi
- Chinese
- Tagalog
- American Sign Language

ICJIA is committed to serving all LEP individuals and will provide language assistance services in any other languages needed to allow equal access to its programs, services, and activities. Further demographic assessments and updates to this LAP will be made to address different language priorities as community needs change and evolve.

Factor 2: The frequency with which LEP persons encounter ICJIA.

Language assistance service obligations will differ for programs with little contact with LEP individuals compared to ones that serve a large LEP population and where its core business is to provide programs, services, and activities to the public.

It is important to note that, unlike other state agencies that directly interact with individuals of the public, the vast majority of ICJIA's interactions are with grant recipients which consist of organizations and their leadership. In most instances, these grantee organizations are better equipped/staffed to access ICJIA programs, services, and activities without requesting language assistance services.

However, given the variety of the communities in which its grantee organizations are located and ICJIA's priority to increase partnerships with smaller local community-based organizations, any staff interaction with the public has the potential to involve a request for language assistance services. It is also possible that ICJIA may get a request for information for research articles, a Freedom of Information request, or accommodation to a public meeting by an LEP individual. Additionally, just because grantee organizations have not sought language assistance in the past does not mean that they would not want such services if they were available. As such, ICJIA will proactively plan for encounters with LEP individuals and will implement the necessary language assistance services to ensure equitable access to programs, services, and activities.

Factor 3: The nature and importance of the programs, services, and activities provided by ICJIA.

The purpose of this factor is to assess the nature and importance of the programs, services, and activities provided by the state agency. The more important the information, programs, services, or activities, or the greater the possible consequences of the contact with LEP individuals, the more likely language assistance services will be needed.

ICJIA is a state agency dedicated to improving the administration of criminal justice. ICJIA brings together key leaders from the justice system and the public to identify critical issues faced by the criminal justice system in Illinois and to propose and evaluate policies, programs, and legislation that address those issues. The agency also works to ensure the criminal justice system in Illinois is efficient and effective.

ICJIA's statutory responsibilities fall under the categories of grants administration, research and analysis, policy and planning, and information systems and technology. The work ICJIA performs in each of these categories affects the lives of a broad cross-section of the public, including the LEP population. ICJIA provides a vital link to organizations to funds intended to provide violence prevention programs which are often provided in communities with a significant LEP population.

Factor 4: The resources available and costs to ICJIA associated with providing language assistance services.

At this time, ICJIA does not have sufficient data to determine the costs it has incurred to provide language assistance services. However, ICJIA is committed to making use of all available resources to furnish language assistance services to all LEP individuals including, without limitation, the following resources (more detailed information in Section III of this LAP):

- Translation Services
- Interpretation Services
- Outreach Efforts
- Hiring bilingual staff
- Website Accessibility

Moving forward, ICJIA will track requests for language assistance services to assess the community needs, available resources, and associated costs.

APPENDIX B

“I SPEAK” POSTER LANGUAGE (STANDARD)

By law, all individuals seeking services from the State of Illinois have the right to free translation and interpretation services in their language of choice.

Translated Phrase: You have the right to an interpreter at no cost to you. Please point to your language and translation will be provided.

- 1. Spanish | Español:** Usted tiene derecho a un intérprete sin costo alguno. Por favor indique su idioma y se le proporcionará traducción.
- 2. Polish | Polski:** Masz prawo do korzystania z usług tłumacza bez ponoszenia kosztów. Wskaż swój język, a zapewnimy tłumaczenie.
- 3. Mandarin | 普通话:** 您有权获得免费的口译服务。请指出您所需的语言，我们将为您提供翻译服务。
- 4. Tagalog | Tagalog:** Mayroon kang karapatan sa isang interpreter nang wala kang babayaran. Mangyaring ituro ang iyong wika at ibigay ang salin.
- 5. Arabic | عربي:** لديك الحق في الحصول على مترجم فوري دون أي تكلفة عليك. يرجى الإشارة إلى لغتك وسيتم توفير الترجمة الفورية.
- 6. Korean | 한국인:** 귀하는 통번역 서비스를 무료로 이용할 권리가 있습니다. 선호 언어를 선택하시면 번역해 드리겠습니다.
- 7. Gujarati | ગુજરાતી:** તમને મફતમાં દુભાષિયા મેળવવાનો અધિકાર છે. કૃપા કરીને તમારી ભાષા દર્શાવો અને અનુવાદ આપવામાં આવશે.
- 8. Russian | Русский:** Вы имеете право на бесплатное получение услуг устного переводчика. Пожалуйста, укажите свой язык, и мы предоставим вам услуги перевода.
- 9. Vietnamese | Tiếng Việt:** Quý vị có quyền được có thông dịch viên miễn phí. Vui lòng chỉ ra ngôn ngữ của quý vị và bản dịch sẽ được cung cấp.
- 10. Urdu | اردو:** آپ کو بلا معاوضہ ایک مترجم کی خدمات حاصل کرنے کا حق ہے۔ براہ کرم اپنی زبان کے متعلق بتائیں اور اس کا ترجمہ فراہم کر دیا جائے گا۔
- 11. Ukrainian | українська:** Ви маєте право на безкоштовне отримання послуг усного перекладача. Будь ласка, вкажіть свою мову, і вам буде надано послуги перекладу.
- 12. Cantonese | 廣州話:** 您有權獲得免費的口譯服務。請指出您所需的語言，我們將為您提供翻譯服務。
- 13. French | Français:** Vous avez droit à un interprète gratuitement. Veuillez indiquer votre langue et une traduction vous sera fournie.
- 14. Hindi | हिन्दी:** आपको बिना किसी खर्च के दुभाषिया की सुविधा प्राप्त करने का अधिकार है। कृपया अपनी भाषा बताएं और अनुवाद उपलब्ध कराया जाएगा।
- 15. Italian | Italiano:** Hai diritto a un interprete senza alcun costo per te. Indica la tua lingua e ti verrà fornita la traduzione.
- 16. Romanian | română:** Aveți dreptul la un interpret, fără costuri suplimentare. Vă rugăm să precizați ce limbă vorbiți pentru a vă putea oferi traducerea.
- 17. Serbian | српски:** Имате право на преводиоца без икаквих трошкова за вас. Наведите свој језик и превод ће бити обезбеђен.
- 18. Bulgarian | български:** Имате право на безплатен преводач. Моля, посочете вашия език и ще бъде осигурен превод.

- 19. **Greek | ελληνικά:** Έχετε το δικαίωμα σε διερμηνέα χωρίς καμία οικονομική επιβάρυνση για εσάς. Παρακαλώ υποδείξτε τη γλώσσα σας και θα σας παρασχεθεί μετάφραση.
- 20. **Swahili | kiswahili:** Una haki ya kupata mkalimani bila gharama yoyote kwako. Tafadhali elekeza kwa lugha yako na tafsiri itatolewa.
- 21. **German | Deutsch:** Sie haben Anspruch auf einen kostenlosen Dolmetscher. Bitte geben Sie Ihre Sprache an, um eine Übersetzung zu erhalten.

FOR STATE EMPLOYEES: HOW TO HELP SOMEONE USING THE “I SPEAK” POSTER

By law, individuals seeking services from the State of Illinois have the right to free translation and interpretation services in their language of choice. Please use this poster to help identify the language an individual speaks. If you are not sure how to assist this individual, please see additional resources below, or ask your supervisor for assistance

For more information and “I Speak” resources in more languages, please visit the Office of New Americans Website at <https://gov.illinois.gov/about/ona/language-access.html>



If the person you are helping cannot find their language on this poster, please direct them to the “Create Your Own I Speak Card” resource on the Governor’s Office of New Americans Website at <https://gov.illinois.gov/about/ona/language-access/download-your-own-i-speak-card.html>, which is available in several additional languages.



For more information about how to access interpretation or translation services, visit the “Language Access” page on the Office of New Americans Website at the above address to learn more about your agency’s Language Access Plan and statewide translation and interpretation contracts that your agency may use.

APPENDIX C

FOR INTERPRETATION SERVICES (VIRTUAL/TELEPHONIC/IN-PERSON):

Propio Language Services, LLC, Contract # CMT 9213100

General Office Number: (888) 528-6692

ICJIA Client Code: **10323**

24-Hour Toll-Free Interpretation Hotline:

- Primary Number: **1-866-828-3280**
- Backup Number (if primary is busy/unavailable): **1-866-386-1284**

NOTE: When using Propio Interpretation Services, please be ready to provide your name and your work number.

FOR TRANSLATION SERVICES:

Multilingual Connections, LLC

Client Code: [PENDING]

General Office Number: (773) 292-5500

NOTE: For translation services, please make sure to coordinate the request for services with the LAC **before** contacting the vendor.

APPENDIX D

Language Assistance Services Tracking Form

The purpose of this form is to help track language assistance services provided by each department or unit under ICJIA's Language Access Plan (LAP). Language assistance services include any request for translated documents/forms (written) into any language other than English, as well as any request for interpretation (oral/spoken) into any language other than English. The information submitted by each department or division will be used for monitoring and evaluating the efficacy of the LAP and/or making changes to services provided under the LAP.

Please complete this Tracking Form and submit it to the LAC at CJA.LAPRequests@illinois.gov.

THIS FORM MUST BE COMPLETED FOR ANY AND ALL REQUESTS FOR LANGUAGE ASSISTANCE SERVICES.

If you have any questions or issues relating to the completion of this tracking form, please contact ICJIA's LAC or designee at CJA.LAPRequests@illinois.gov.

1. Date of Language Assistance Services Request

_____ (Example: January 7, 2026)

2. First and Last Name of Person Filling Out the Tracking Form:

3. ICJIA department or unit (check all that apply)

- Office of the Executive Director
- Office of the Chief of Staff
- Office of Administration Services
- Office of Fiscal Management
- Office of Human Resources
- Office of Public Information
- Federal and State Grants Unit
- Office of the General Counsel
- Information Systems Unit
- Research and Analysis Unit

4. What type of language assistance service was requested?

- Translated Document (Written Text)
- Interpretation Request (Oral/Spoken)

5. What type of interpretation service was requested?

- In person (at a meeting, public event, etc.)
- Over the Phone Interpretation
- Pre-recorded message (recorded TA, meeting audio, etc.)
- Remote Interpretation (Webex, Zoom, etc.)
- Other _____

6. Please provide a specific title or name for the type of completed language assistance service request. (For example: "Interpretation for upcoming Budget Committee Meeting" or "Translated R&A article relating to trauma experiences of LGBTQ+ victims")

7. In what language was the language assistance service provided?

- Spanish
- Polish
- Arabic
- Hindi
- Chinese
- Taglog
- American Sign Language
- Other _____

8. Please provide the contact information of the language assistance services requestor.

Name: _____
Email: _____
Address: _____
Phone: _____

NOTE: If the language assistance service is related to the translation of a written document, please provide a copy of the translated document with this Tracking Form to the LAC or designee at CJA.LAPRequests@illinois.gov.

APPENDIX E



COMPLAINT FORM

Federal and State laws and regulations require the State of Illinois to comply with all nondiscrimination laws, including but not limited to the federal Civil Rights Act of 1964, the Americans with Disabilities Act, and the Illinois Human Rights Act. This includes ensuring that all individuals can meaningfully access State of Illinois services, benefits, and programs. If you feel have been denied and/or restricted access to State services, benefits, or programs based on your age, race, sex, disability, national origin, sexual orientation, or any other protected reason, please complete this form and submit it to OGCReports@illinois.gov.

INFORMATION ABOUT YOU

YOUR NAME AND ADDRESS:

Name _____

Address _____

City _____

State _____

ZIP Code _____

YOUR TELEPHONE NUMBER(S) AND EMAIL:

Home _____

Alternate _____

What is a convenient time to contact you?

AM

PM

Email _____

BASIS OF COMPLAINT:

Please check all that apply

Race

Sex

Gender Identity

Disability

Color

Age

Pregnancy

Retaliation

Religion

National Origin

Citizenship Status

Sexual Harassment

Sexual Orientation

Language Access

Arrest Record

Other

INFORMATION ABOUT YOUR COMPLAINT

Please identify the State of Illinois Office (or other location) where the incident(s) about which you are complaining occurred:

Please identify as best you can the State of Illinois employee(s) and/or other people (s) involved in the incident(s):

Please identify the approximate time(s) and date(s) when the incident(s) occurred:

Please describe your problem or concern. Be sure to include such information as who was involved and what they did and/or said, including any offensive or derogatory language used; if you feel that you, or another, were treated differently than others; if you tried and were not able to access State information or services; and any other information you think is important. If you require additional space or have additional written material about your complaint, please attach it to this form.

Do you have witnesses who have information about your complaint? If so, please state their names, addresses, and phone numbers.

Name	Address	Telephone Number

LANGUAGE ACCESS:

Please complete this section if your complaint concerns access to government services in the language that you speak or write.

1. What language(s) do you speak? _____
2. Do you read and write in your language? _____
3. Did you have help completing this form?

If you answered "Yes" to #3, please list the name and contact information for the person who assisted you: _____

If you are not satisfied with ICJIA's response regarding your language access complaint, you may also send your complaint to: the Governor's Office of New Americans at gov.newamericans@illinois.gov.

I certify that I have read this complaint and that the information that I have provided is true and accurate to the best of my knowledge.

Signature

Date