

Language Access Plan
Illinois Department of Corrections (IDOC)
Overview of Standards & Current Systems and Practices



(August 2026)

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SECTION 1: INTRODUCTION AND BACKGROUND

1.1 AGENCY OVERVIEW

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 ("LAP") outlines IDOC's five-year plan for language access implementation for individuals with limited English proficiency ("LEP"), a timeline selected to achieve greater alignment with the Illinois Language Equity and Access Act ("the Act") (15 ILCS 56; Public Act 103-0723). Section 1 of this LAP sets the stage for the plan by providing an overview of IDOC and establishing the purpose, goals, and guiding principles that anchor the LAP. The sections that follow, Sections 2 to 8, address specific areas of language access implementation. Each area of implementation is addressed in two distinct parts:

1. **Overview of Standard** (or Implementation Area): A brief description of the standard based on federal guidance and the Act.
2. **Current IDOC Systems and Practices**: A description of IDOC's current practices, existing infrastructure and/or progress to date in relation to the standard.

IDOC's plan will include Implementation Goals that IDOC will pursue to meet compliance objectives and a 5-Year Action Plan to support agency implementation.

IDOC's ROLE

IDOC's mission: To serve justice in Illinois and increase public safety by promoting positive change for those in custody, operating successful reentry programs, and reducing victimization.

The IDOC website is: <https://idoc.illinois.gov/>

The IDOC Language Access Coordinator is: Michael Hershey (ADA Administrator)
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IDOC's Director is responsible for the overall direction of the agency. IDOC's executive management team (EMT) includes but is not limited to the Director, Assistant Director, Chief of Administrative Services, Chief of Staff, Chief of Parole, Chief of Investigations and Intelligence, Chief Legal Counsel, Chief of Women and Family Services, Chief Compliance Officer, Chief of Operations, Chief Fiscal Officer, Chief Public Safety Officer, Chief of Programs and Support Services, Chief Inspector, Chief Internal Auditor, and Agency Medical Director. The EMT is responsible for developing the short- and long-term goals of IDOC's day-to-day operations. The EMT conducts monthly meetings. Division Administrators and Chiefs, which includes Chief of Staff, Chief of Administration, Chief Fiscal Officer, Chief Compliance Officer, Chief Legal Counsel, Chief of Operations, Chief of Programs, Chief of Health Services, Chief of Mental Health Services, Chief of Oral Health Services, Chief Internal Auditor, Chief Inspector, Chief Public Safety Officer, Chief of Parole, Chief of Intelligence and Internal Investigations, Chief of Women's Division, and Industries Chief Executive Officer, are responsible for monitoring and managing daily operations, as outlined in the Unified Code of Corrections (UCC) (730 ILCS 5/). The Chiefs work collaboratively with their teams, fostering communication across all levels to uphold the code's principles and mandates. Most of IDOC's powers are enumerated by the UCC (730 ILCS 5/).

1.2 LANGUAGE ACCESS PLAN LEGAL BASIS AND PURPOSE

PURPOSE AND GOALS

This LAP aims to provide guidance to IDOC staff and establish a roadmap to support meaningful access to the department's services, programs, and opportunities for individuals with LEP. This LAP also seeks to align the department's efforts and bring IDOC into compliance with the 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.

AUTHORITY

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 prohibit discrimination based on race, color, or national origin (which includes limited English proficiency). Illinois is committed to advancing the goals of Title VI of the Civil Rights Act of 1964 in alignment with the Act.

Title VI of the Civil Rights Act of 1964

[Title VI of the Civil Rights Act of 1964](#) (42 U.S.C. § 2000d) (Title VI) prohibits discrimination based on race, color, or national origin (which includes Limited English Proficiency) in any program or activity receiving federal financial assistance. As a recipient of federal financial assistance, the IDOC is bound by Title VI of the Civil Rights Act of 1964.

Illinois Civil Rights Act of 2003

The [Illinois Civil Rights Act](#) prohibits State, county, or local government 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.

Illinois Human Rights Act (IHRA)

The [Illinois Human Rights Act](#) consolidates existing laws and administrative processes addressing civil rights in Illinois. IHRA prohibits discrimination in employment, housing, financial credit, and public accommodations because of race, color, sex, religion, ancestry, national origin, age, physical or mental disability, unfavorable military discharge, family responsibilities, and marital status, as well as retaliation for opposing discrimination. IHRA established the Illinois Department of Human Rights (IDHR) and the Illinois Human Rights Commission (IHRC) as enforcing agencies.¹

Language Equity and Access Act (the Act)

Signed into law by Governor Pritzker in 2024, the Language Equity and Access Act aims to ensure that all residents can access state information, programs, and services equitably, and that limited English proficiency (LEP) does not prevent anyone from fully participating in civic life.² The Act aims to ensure all Illinois residents, including individuals with LEP, have meaningful and equitable access to state services, programs, information, and activities by

¹ <https://dhr.illinois.gov/about-us/directors-office/agency-overview-and-history.html>

² See *Language Equity and Access Act*, 15 ILCS 56; Public Act 103-0723, 103rd Gen. Assem. (Ill. 2024), <https://www.ilga.gov/legislation/publicacts/fulltext.asp?Name=103-0723>.

removing language barriers. The Act incorporates federal guidance for ensuring meaningful access for individuals with LEP and other federal and state legislation that prohibit discrimination based on national origin and promote language access, including Title VI of the Civil Rights Act of 1964, the Illinois Human Rights Act of 1979, and the Illinois Civil Rights Act of 2003.³

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, with the support of the Department of Human Services. 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 state agencies will develop Language Access Plans that will inform how the agency will ensure meaningful access to individuals with LEP, appoint a Language Access Coordinator (LAC) to oversee implementation within each agency, translate vital documents, and provide qualified interpretation services for LEP populations.

GUIDING PRINCIPLES

In accordance with federal and state requirements, including the Act, this LAP provides a framework for ensuring IDOC can deliver timely and meaningful language assistance services to IDOC's constituents with LEP. IDOC is committed to providing equitable language access to its services, programs and activities for all individuals, regardless of the language they use. IDOC will operationalize this commitment to language access by:

- Designating an agency Language Access Coordinator ("LAC") who is responsible for overseeing the development and implementation of the LAP.
- Designating LACs at each facility to assist staff at the point of contact with both individuals in custody and the general public to identify and facilitate delivery of language access services in a timely and competent manner.
- Forming a Language Access Steering Committee comprised of representatives from various divisions in IDOC that will be responsible for developing, implementing, monitoring, evaluating, and reporting on IDOC's compliance with the Act.
- Providing accurate, timely, and effective communication, including oral and written language services needed to assist all individuals with LEP 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

³ See *Language Equity and Access Act*, 15 ILCS 56; Pub. Act 103-0723.

displaying public notices in commonly spoken languages that communicate the availability of free language assistance services and how to access them.

- Conducting a regular assessment that describes the population of people with LEP that the agency serves, the policy and programmatic actions implemented to ensure meaningful access, and the metrics used to measure compliance with the Act. This assessment will be informed by the federally recognized four-factor analysis, which considers the number or proportion of people with LEP served, the frequency and context, the nature and importance of services provided, and the agency's available resources and costs.
- Strengthening IDOC's 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 agency will also 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 support 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.
- Maintaining a complaint and review process that ensures timely resolution.
- Providing ongoing employee development and training to maintain well-trained bilingual employees and general staff.
- Reporting and collecting data on bilingual staff roles, language certifications, and language capacity across its workforce.
- Ensuring IDOC's LAP and related materials are publicly available through IDOC's website and other accessible formats.

DEFINITIONS

- **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, or individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English.
- **Interpretation:** The act of listening to communication in one language (source language) and orally converting it to another language (target language) while retaining the same intent and meaning of the original communication.

- **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.
- **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 Access Coordinator (LAC):** Staff of a State Agency tasked with coordinating and overseeing the entity's language access implementation activities 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, working under an LAC.
- **Language Assistance Services:** Oral and written language services needed to assist individuals with LEP to communicate effectively with staff, and to provide individuals with LEP meaningful access to, and equal opportunity to participate fully in, the services, activities, or other programs administered by the State.
- **Language Service Provider (LSP):** A vetted contractor/vendor contracted to perform language assistance services, such as interpretation and/or translation, for individuals with LEP.
- **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 and the individual has not developed fluency in the English language.
- **Meaningful Language Access:** The ability to receive accurate, timely, and effective information in one's spoken or preferred language, and to participate in and benefit from public services offered by a State Agency, at no cost to the individual with LEP. Meaningful access must not be unreasonably restricted, delayed, or inferior compared to access provided to individuals with English proficiency.
- **Oral Language Services:** Includes various methods to provide verbal information and interpretation, such as staff interpreters, Multilingual Staff, telephone interpreter programs, tele-video interpretation services, and private interpreter programs.
- **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 (2010) defines Plain Language as "clear, concise, well organized and follows other best practices appropriate to the subject or field and intended audience."⁴ 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.

⁴ See Public Law 111-274. 124 Stat. 2861 <https://www.gpo.gov/fdsys/pkg/PLAW-111publ274/pdf/PLAW-111publ274.pdf>.

- **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:** Paper or electronic written material that contains information that affects a person's access to, retention of, termination of, or exclusion from the State Agency's program services or benefits or is required by law.

SECTION 2: NEEDS ASSESSMENT

Illinois is home to a diverse population with cultural and linguistic backgrounds from around the world. To support IDOC in determining and prioritizing language assistance services, this LAP includes a Needs Assessment that identifies the languages spoken by individuals with languages other than English served or likely to be served by IDOC.

A four-factor analysis is used in this section as a framework to determine the language services IDOC needs to prioritize to meet the needs of individuals with LEP. The four-factor analysis is a tool designed to help recipients of federal financial assistance conduct an individualized assessment that considers the following four factors:⁵

1. Factor 1: Data collection and analysis of the population with LEP
2. Factor 2: Data collection and analysis of languages encountered
3. Factor 3: Services Provided to General Public and/or Prospective Limited English Proficient Users
4. 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 IDOC provides that the general public and potential individuals with LEP would access.

2.1 FOUR-FACTOR ANALYSIS

FACTOR 1

⁵ 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>

Overview of Standard

Limited English Proficiency Population Data Collection and Analysis assesses the number or proportion of individuals with LEP that could be served by or encounter IDOC's services.

The 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 people with LEP come in contact with services, programs, or activities provided by the State agency. In addition, the Act directs ONA, with the support of the Department of Human Services 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 Language Access Plans.

The LAP must include a description of the LEP populations served, the policy and programmatic actions taken to ensure meaningful access, and the metrics used to measure compliance with the Act. 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 IDOC is positioned to adequately identify underserved communities with LEP and emerging language needs and address any barriers that may prevent access to critical public services.

Current IDOC Systems and Practices

In 2026, IDOC is using the following findings from a demographic analysis⁶ on the State's individuals with LEP conducted by the University of Illinois Chicago (in partnership with ONA):

- 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:

⁶ 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://arcq.is/1Py4n0>.

IDOC Language Access Plan

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 Illinois 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 counties, the second language is French/Haitian/Cajun. In Madison County, it's Tagalog. In Cook, DuPage, and Kane counties, the second language category is Slavic. In Boone County, "other Asian Pacific Islander" is second to Spanish.
- A statewide map of persons who don't 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 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 counties such as Cass, Douglas, or Union.

- After years of decline, the number of Illinois residents who don't 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 shows about 1,082,000 people, for a gain of some 82,000 between 2019 and 2023.

FACTOR 2

Overview of Standard

Language Encounters Data Collection and Analysis assesses the frequency with which LEP individuals encounter IDOC's services, programs, or activities.

The Act requires State agencies to conduct an individualized assessment as part of its LAP that considers the frequency with which persons with LEP come into contact with the services, programs, and activities provided by the agency. This analysis supports the IDOC's ability to identify language access needs and ensure meaningful access.

Current IDOC Systems and Practices

IDOC will develop and utilize methods, as feasible, to collect and analyze data regarding encounters with individuals with LEP, including the following:

- Collect data on encounters with individuals with LEP that take place in person, by telephone, via email, and through online platforms.
- Track the languages encountered and types of language assistance services requested and/or provided during those encounters.
- Conduct regular assessments and identify high-volume languages and the most frequently requested or needed language assistance services to ensure meaningful access that is accurate, timely, and effective at no cost to people with LEP.

IDOC utilizes O360 to track individuals in custody who have limited English skills, identifying native language and English proficiency. IDOC, like Illinois, serves a diverse population. According to IDOC's tracking system, the number of individuals in custody that report their primary language as a language other than English is 434, with Spanish representing the native language identified by the vast majority of those individuals. As of June 2026, the languages other than English and number of individuals for each language reported and tracked in O360 is as follows:

IDOC Language Access Plan

Arabic: 5
Bulgarian: 1
Chinese: 2
French: 1
Haitian Creole: 3
Hungarian: 1
Indonesian: 1
Korean: 1
Mongolian: 1
Pashto: 1
Polish: 4
Punjabi: 3
Romanian: 1
Russian: 6
Serbian: 1
Somali: 1
Spanish: 399
Thai: 1
Turkish: 1

IDOC also utilizes Propio Analytics to track and analyze the use of on-site, telephonic, and video interpretation services at each facility, including the specific language needs of each facility.

FACTOR 3

Overview of Standard

Services Provided to General Public and/or Prospective Limited English Proficient Users assesses the nature and importance of the programs, activities, or services provided by IDOC.

The 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.

Current IDOC Systems and Practices

To ensure meaningful access to critical and urgent information and services, IDOC will outline procedures for prioritizing language assistance for vital and urgent information and activities. IDOC 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.

IDOC facilities must provide language assistance services to ensure individuals with LEP have meaningful access and the ability to participate fully in the services, activities, and programs administered by IDOC facilities. Language assistance may be provided through a variety of means, including qualified bilingual and multilingual staff, contract interpreters (including telephonic interpretation), interpreters from community organizations, or volunteer interpreter programs.

FACTOR 4

Overview of Standard

Budget and Available Resources assesses the resources available to IDOC currently, as well as the cost associated with providing the language assistance.

The Act requires State agencies to review the resources available to the State agency and the costs. It is best practice for the budget for language access 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.

Current IDOC Systems and Practices

IDOC funding for this plan will be budgeted through the appropriated funds provided to IDOC. Based on the assessment of resources, IDOC 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.

SECTION 3: STAFFING AND COORDINATION

This section outlines the roles and responsibilities of IDOC's language access staff, including the agency LAC who is responsible for monitoring and ensuring the implementation of language assistance services across the agency according to the LAP.

Overview of Standard

The Act requires each State agency to designate a LAC who is responsible for overseeing the development and implementation of the agency's language access plan. The agency LAC will support ongoing compliance by partnering with ONA to ensure coordinated implementation and compliance with language access requirements. The Act also directs State agencies to incorporate language equity compliance provisions into their contracts with vendors, grantees, and purchase of care entities, ensuring that these funded entities provide language assistance services to individuals with LEP.

Current IDOC Systems and Practices

IDOC has designated an agency LAC in addition to designating a LAC at each facility. The LAC at each facility is responsible for assisting staff at the point of contact with both individuals in custody and the general public to identify LEP individuals and facilitate the delivery of language access services in a timely and competent manner that aligns with the Act and national language access best practices.

IDOC will establish additional internal roles that it identifies as necessary to implement this LAP. To assist with this process and ensure compliance with the Act, IDOC has established a Language Access Steering Committee ("LASC") that meets quarterly to monitor and evaluate IDOC's LAP and determine specific actions necessary to meet agency goals and comply with the Act. The LASC is made up of representatives from the following divisions:

- ADA Administrator & LAC – Committee Chair
- Communications Representative
- Staff Development & Training Representative
- Affirmative Action Representative
- Medical Representative
- Mental Health Representative
- Policy & Directives Representative
- Legal Services Representative
- Operations Representative
- Human Resources Representative
- Chief Inspector
- Programs Representative
- General Office Representative
- Parole Representative

IDOC is committed to co-creating and advancing a more diverse, equitable, and inclusive environment for staff and the incarcerated population by determining which bilingual positions are needed for the operational needs of the population and staffing and prioritizing hiring for identified positions. Consistent with the Act's directive to ensure adequate staffing of bilingual employees, IDOC will continue to identify bilingual and multilingual employees among its current staff, as well as recruit, hire, and retain bilingual and multilingual staff to support the language assistance services provided to individuals with LEP. Currently, IDOC employs 103 staff members across its facilities that are certified as bilingual in Spanish. Additionally, since the beginning of 2026, IDOC has posted over 78 bilingual positions across its facilities statewide and is actively working to fill all these positions with qualified bilingual candidates.

IDOC conducts programs and services in partnership with a wide network of grantees and funded entities. Therefore, IDOC will take affirmative steps to ensure those entities fulfill language access obligations. Affirmative steps may include explicit provisions in contracts, intergovernmental agreements, and memorandums of understanding that ensure the grantees and funded entities acknowledge their obligations to comply with the Act and provide language access services as required to ensure individuals with LEP have meaningful access.

SECTION 4: LANGUAGE ASSISTANCE SERVICES

IDOC is committed to taking reasonable steps to ensure meaningful communication and access to information for individuals with LEP. The Language Assistance Services section outlines the types of language assistance IDOC currently provides, as well as the services IDOC plans to provide to support meaningful communication and participation for individuals with LEP. The language assistance services outlined in the LAP 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.

4.1 LANGUAGE ASSISTANCE SERVICES PLAN

LANGUAGE ACCESS SERVICES

1. LANGUAGE NEED IDENTIFICATION

Overview of Standard

The Act requires State agencies to develop clear policy and programmatic actions to ensure meaningful access. It is national language access best practice for State agencies to utilize language-need identification materials, such as printed multilingual I-Speak resource cards, to assist with the identification of the languages requested by individuals with LEP. These tools support meaningful access by enabling individuals with LEP to indicate their language needs and assisting State agencies meet their obligations to ensure accurate, timely, and effective communication.

Current IDOC Systems and Practices

Department staff shall, 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, and make reasonable efforts to obtain services if they are needed to effectively communicate with the individual. Department staff can determine whether a person needs language assistance in several ways, including:

- Self-identification by the non-English speaker, LEP individual, or companion.
- Inquiring into the primary language of the individual if they have self-identified as needing language assistance services.
- Asking a multilingual staff or qualified interpreter to verify an individual's primary language.
- Using an "I Speak" language identification card or poster.

Once an LEP individual is identified, IDOC staff shall notify the facility LAC to coordinate language assistance services as necessary.

IDOC must also assess the language assistance needs of its current public points of contact to inform policy necessary to implement language assistance services that increase access to their respective programs and services for all populations. This assessment may include identifying the non-English languages spoken by the population likely to be accessing the agency's services and whether any barriers exist that hinder effective oral and written communication with individuals with LEP.

IDOC must also assess its capacity to fulfill the commitment to providing competent language assistance at no cost and in a timely manner to individuals with LEP. IDOC self-assessments will also help ensure meaningful access to

participate fully in their loved one's rehabilitation, activities, and programs. This includes ensuring effective communication between individuals with LEP and agency staff members, volunteers, and contractors.

2. HIRING/CONTRACTING QUALIFIED INTERPRETERS FOR IN-PERSON COMMUNICATION

Overview of Standard

The Act requires State agencies to ensure individuals with LEP have meaningful access to competent, timely, and effective interpretation services when interacting with agency staff, programs, and services. The use of trained and qualified interpreters, in alignment with standards developed by ONA, supports agency compliance and ensures meaningful access.

Current IDOC Systems and Practices

IDOC facilities must provide oral language assistance services to ensure meaningful access to participate fully in the services, activities, and programs administered by IDOC facilities. Language assistance for in-person communication may be provided through a variety of means, including qualified bilingual and multilingual staff, contract interpreters, interpreters from community organizations, or volunteer interpreter programs. IDOC also utilizes the joint purchase master contract between DoIT and Propio to provide interpretation as needed.

IDOC will continue to identify bilingual and multilingual employees among its current staff, as well as recruit, hire, and retain bilingual and multilingual staff to provide competent interpretation for in-person communications with individuals with LEP. The facility point of contact shall communicate with the facility LAC to coordinate language assistance services for any individuals with LEP.

3. HIRING/CONTRACTING QUALIFIED INTERPRETERS FOR VIRTUAL COMMUNICATION (OVER-THE-PHONE OR VIDEO)

Overview of Standard

The Act requires State agencies to ensure individuals with LEP have meaningful access to competent, timely, and effective interpretation services when interacting with agency staff, programs, and services.

Current IDOC Systems and Practices

IDOC facilities must provide oral language assistance services to ensure meaningful access to participate fully in the services, activities, and programs administered by IDOC. Language assistance for virtual communications may be provided through a variety of means, including qualified bilingual and multilingual staff, contract interpreters, interpreters from community organizations, or volunteer interpreter programs.

IDOC will continue to identify bilingual and multilingual employees among its current staff, as well as recruit, hire, and retain bilingual and multilingual staff to provide competent interpretation for virtual communications with individuals with LEP.

The facility point of contact shall communicate with the facility LAC to coordinate language assistance services for any individuals with LEP. IDOC utilizes the joint purchase master contract between DoIT and Propio for most virtual interpretation services. IDOC staff are instructed during pre-service and annual training that Propio is available to staff for telephonic and video interpreter services. To use Propio, staff are instructed to:

- Connect to Propio Language Services by dialing 1-866-828-3280.
- When prompted enter the access code: **Use assigned facility code**
- Enter the 2-digit language code for desired language.
- Provide the agent with the following:
 - Caller's first name and first initial of last name.
 - Phone number (with area code) that is linked to the facility code.
 - Click on the conference to merge the caller, interpreter, and IDOC into one call.

4. EMPLOYING/ UTILIZING BILINGUAL OR MULTILINGUAL STAFF

Overview of Standard

The Act requires ONA, with the support of the Department of Human Services and any other relevant agencies, to set standards for adequate staffing of bilingual employees at State agencies, including a methodology for monitoring implementation and updating the State Services Assurance Act and the Bilingual Employment Plan, based on the language needs assessment. While the Act

specifically uses the term "bilingual staff", national language access best practices recognize and value the role of multilingual staff, highlighting the broad linguistic competencies of individuals who possess proficiency in more than two languages or multiple linguistic repertoires.

Current IDOC Systems and Practices

IDOC will continue to identify bilingual and multilingual employees among its current staff, as well as recruit, hire, and retain bilingual and multilingual staff to support the language assistance services provided to individuals with LEP. IDOC's bilingual and multilingual staff will be utilized to provide interpretation and translation services to individuals with LEP. IDOC's bilingual and multilingual staff will also inform the facility LACs of any additional bilingual and multilingual staff needed to provide language assistance services. The facility LACs will report any additional needs to the IDOC LASC at their quarterly meetings, and the HR representative will develop necessary employment plans as agency resources allow.

5. TRANSLATION OF VITAL DOCUMENTS AND ONLINE CONTENT

Overview of Standard

The Act requires State agencies to ensure that qualified translators translate vital documents accurately, completely, and in a timely manner, in accordance with the Act and guidance issued by ONA, including the most recent Language Needs Assessment Report. Translation priorities should also be guided by the demographic data of the agency's service population.

State agencies must provide written notice in the primary language of the individual of their right to oral interpretation of the written material at no cost.

Current IDOC Systems and Practices

IDOC facilities must provide written translation services to ensure meaningful access to participate fully in the services, activities, programs, or other benefits administered by the Department. IDOC shall make efforts to ensure that all documents are written in a manner that promotes understanding by the reader. Matters of plain language and literacy will be considered for all documents, before and after the translation process.

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To increase availability and quality of written language assistance services, IDOC's LAC shall consult with each facility LAC to identify vital documents (as defined by Section 10 of the Act and Section 1 of this LAP) for translating in languages other than English, and identify the languages needed for translation at each facility. IDOC's LAC will routinely report any vital document translation needs to IDOC's LASC, which will coordinate with the appropriate division representatives on the committee to develop a program that ensures IDOC is providing written language assistance at facilities and via IDOC's website when necessary. IDOC will ensure that agency staff are trained to contact the facility LAC to arrange for document translation when necessary. IDOC may also use the services of qualified, professional translators to improve access as agency resources allow. IDOC utilizes the state master contract between CMS and Multilingual Connections for document translations, as well as the Enterprise Translation Hub (ETH) provided by DoIT.

IDOC's LASC will track and make accessible all vital documents that have been translated and will update the list of translated vital documents on an ongoing basis. The committee will also comprehensively evaluate the Department's need for written language assistance services and identify, translate, and make documents accessible in various formats, including print and electronic media. Areas of evaluation may include quality and quantity of written translations, utilization of appropriate communication channels, and the accessibility and quality of language assistance services provided.

Currently, all IDOC facilities provide individuals in custody with an orientation guide and orientation receipt in Spanish when it is required or requested, and all facilities display PREA notices in Spanish. IDOC also posts translated high-stakes information in all high-traffic areas to maximize visibility. IDOC's website provides a Spanish version of the instructions to create an account with ICSolutions to contact individuals in custody by phone and video, and a translation tool on the IDOC website allows it to be viewed in Spanish, Polish, Chinese, Arabic, Hindi, or Tagalog.

IDOC also provides Spanish versions of the following vital documents:

- Notification of Renunciation Acceptance/Rejection
- Security Threat Group Renunciation Statement
- Individual in Custody's Grievance
- Prospective Visitor's Interview
- Permission to Allow Visitation of a Minor Child
- Substance Abuse Treatment Program Consent to Participate
- Application for Interstate Compact Transfer

- Living Will
- Power of Attorney

6. DEVELOPMENT AND DISTRIBUTION OF MULTILINGUAL CONTENT IN OTHER FORMATS (PUBLIC SERVICE ANNOUNCEMENTS, RADIO MESSAGING, SOCIAL MEDIA INFORMATION)

Overview of Standard

The Act requires State agencies to take steps to ensure that individuals with LEP have meaningful access to digital content. All translations of public-facing digital content will be completed in a manner that ensures accuracy, completeness, and timeliness, consistent with the 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 Act.

Current IDOC Systems and Practices

IDOC utilizes multiple platforms for digital content, and within the intranet, many of its documents are translated to Spanish. To increase availability and quality of language assistance services, IDOC's LASC will evaluate the use of other formats to distribute multilingual content as agency resources allow.

SECTION 5: NOTIFICATION OF LANGUAGE ASSISTANCE SERVICES

The Notification of Language Assistance Services section outlines how IDOC can notify the public of language assistance services and provide information on how language assistance services can be requested. Such communication will assist individuals with LEP in understanding the services provided by IDOC, which can increase public trust and confidence.

5.1 NOTIFICATION OF LANGUAGE ASSISTANCE SERVICES PLAN

Overview of Standard

The 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.

Current IDOC Systems and Practices

IDOC will provide multilingual public notices in various formats—both digital and physical—to promote broad public awareness that interpretation and translation services are available free of charge. 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. IDOC’s LAC, in conjunction with IDOC’s LASC, shall identify the appropriate languages for translation.

IDOC shall take reasonable steps to translate public website content and electronic documents containing vital information about agency programs, services, and activities. Translations of web content may include important information intended for the general public, such as information about:

- IDOC’s mission;
- How to file a complaint;
- How to contact IDOC;
- How to visit or communicate with an individual in custody; and
- Other information designed to educate individuals.

If an LEP individual requests information from the website that is not translated, they may contact IDOC’s Public Information Officer at Naomi.Puzzello@Illinois.gov, who shall contact IDOC’s agency LAC for assistance with translation services.

SECTION 6: LANGUAGE ACCESS TRAINING

All employees shall receive LEP training during Pre-Service Orientation Training (PSOT), Pre-Service Corrections Training (PSCT), annual cycle training, and/or as necessary to ensure compliance with the Act. Training shall include, but not be limited to:

- Identifying the language needs of an individual with LEP.
- Coordinating with facility LACs to provide language assistance services.
- Working with an interpreter in person or via telephone.
- Requesting documents for translation.
- Accessing and providing language assistance services through multilingual employees, in-house interpreters and translators, or contracted personnel.
- Tracking the use of language assistance services.

Facility LACs shall receive additional, specialized training to ensure LEP individuals have meaningful access to participate fully in the services, activities, and programs administered by IDOC.

6.1 LANGUAGE ACCESS TRAINING PLAN

Overview of Standard

The Act requires that State agencies develop and implement an ongoing employee development and training strategy to maintain well-trained bilingual employees and general staff. This ensures that agencies are equipped to deliver effective language assistance services.

Current IDOC Systems and Practices

To ensure all IDOC staff understand the importance of, and can provide both oral and written language assistance services, the Staff Development & Training Representative on IDOC's LASC will regularly monitor the efficacy of language access trainings and report any need to modify staff trainings to the LASC, including pre-service training for new employees and annual cycle training for existing employees. All agency staff will be notified that their facility provides language assistance and be informed of how to contact the facility or agency LAC when they encounter an individual with LEP.

SECTION 7: CONCERN RESOLUTION PROCESS

The Concern Resolution Process section highlights the need for allowing public feedback on the quality, accessibility, and effectiveness of language assistance services to address any concerns that arise. This section outlines how IDOC will develop and make publicly available a multilingual concern resolution form, collect and log complaints submitted by individuals with LEP and others, and promptly investigate and address each concern in a timely manner. Additionally, this section describes how the IDOC 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 Act requires State agencies to establish and make publicly available a process for individuals with LEP and members of the public to submit concerns related to access to language assistance services. Section 15(b)(5) of the Act also requires each State agency to develop an internal complaint and review process.

Current IDOC Systems and Practices

If a member of the general public believes they have been denied language access services by IDOC, they may submit their concern in writing by completing the form on the [Contact Us](#) page, emailing DOC.Constituent.Services@illinois.gov or by mail to the following address:

Illinois Department of Corrections
Office of Constituent Services
1000 E. Converse Ave
P.O. Box 19277
Springfield, IL 62794-9277

The written concern must be received within six (6) months of the alleged violation. IDOC will promptly address each concern. IDOC's LAC will utilize a process to track all concerns received, including when the concern was received and the status of the concern. IDOC's LAC will also notify ONA upon receipt of any language access concerns submitted by the public to ensure that concerns are resolved in a timely and adequate manner.

When resolving a concern, IDOC will notify the complainant that, if they feel the resolution is inadequate, they have the option to elevate the complaint to ONA by accessing and submitting the ONA Language Access Complaint Elevation Form at the following link: <https://gov.illinois.gov/about/ona/language-access/language-access-complaint-elevation-form.html>

IDOC's LAC will provide the Steering Committee with a report summarizing all concerns and resolutions, quarterly, which will ensure that trends are timely identified and necessary improvements are made to IDOC's provision of language access services.

SECTION 8: MONITORING, EVALUATING AND REPORTING

The Monitoring, Evaluating and Reporting section outlines the implementation and procedures IDOC will utilize to assess compliance with the Act and evaluate the effectiveness of this LAP. This section will outline current practices and procedures for monitoring and collecting language access data, analyzing language use and language assistance needs, participating in community engagement/community feedback sessions, and evaluating the quality of language assistance services offered by IDOC.

8.1 MONITORING, EVALUATING AND REPORTING PLAN

Overview of Standard

The Act requires State agencies to coordinate with ONA to review and monitor the implementation of the agency's LAP and ensure ongoing compliance with the Act, including assessing language assistance needs and patterns of language use and incorporating updated data and performance metrics into each new iteration of the agency's LAP, as required under Section 25(d)(3).

Current IDOC Systems and Practices

IDOC's LASC will assess language assistance needs, patterns of language use, and language access service delivery on an ongoing basis to measure compliance with the Act. IDOC will use the performance metrics outlined by ONA, which include:

- Agency Capacity Building
- Language Access Needs Assessment
- Language Access Service Delivery
- Community Outreach and Public Notice
- Monitoring and Evaluation

IDOC's LASC will meet quarterly to review statewide and agency-specific data on LEP populations, including demographic shifts and the identification of new or emerging language needs, as highlighted by the State's Language Needs Assessment Report and IDOC's review of data on agency use of Multilingual Connections, Propio, and DoIT's document translation portal. The committee will use this information to evaluate the effectiveness of current policies and practices and to promote continuous improvement of

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language access services and ensure compliance with the Act. The committee will also track progress on the implementation of LAP initiatives and achievement of established goals; review expenditures related to language assistance services; and assess whether projected changes in costs require budget adjustments or modifications to service delivery methods.

IDOC's LAC will incorporate updated data and performance metrics into each new iteration of the LAP, as required under Section 25(d)(3) of the Act.