



IPCB
Illinois Pollution Control Board

LANGUAGE ACCESS PLAN

Updated 1/7/2026

TABLE OF CONTENTS

Table of Contents	1
Section 1: Introduction and Background	3
1.1 Agency Overview	3
Introduction	3
IPCB Role	4
1.2 Language Access Plan Legal Basis and Purpose	5
Purpose and Goals	5
Authority	5
Guiding Principles	7
Definitions	8
Section 2: Needs Assessment	10
2.1 Four-Factor Analysis	11
Factor 1	11
Factor 2	14
Factor 3	15
Factor 4	15
Section 3: Staffing and Coordination	16
Section 4: Language Assistance Services	17
4.1 Language Assistance Services Plan	17
Language Access Services	17
1. Language Need Identification	17
2. Hiring/Contracting Qualified Interpreters for In-Person Communication	18
3. Hiring/Contracting Qualified Interpreters for Virtual Communication (Over-the-Phone or Video)	19
4. Employing/ Utilizing Bilingual or Multilingual Staff	19
5. Translation of Vital Documents and Online Content	20
6. Development and Distribution of Multilingual Content in Other Formats (Public Service Announcements, Radio Messaging, Social Media Information)	21
Section 5: Notification of Language Assistance Services	21

Illinois Pollution Control Board Language Access Plan

5.1 Notification of Language Assistance Services Plan	22
Section 6: Language Access Training	22
6.1 Language Access Training Plan	22
Section 7: Concern Resolution Process	23
Section 8: Monitoring, Evaluation, and Reporting	24
8.1 Monitoring, Evaluation, and Reporting Plan	24
Section 9: Language Access Complaint FORM	26
Section 10: Appendix	28
10.1 Appendix 1: Limited English Speakers Population In Illinois and by Illinois County Weblink	
	28

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 outlines the Illinois Pollution Control Board's ("IPCB") five-year plan for language access implementation, a timeline selected to achieve greater alignment with the Illinois Language Equity and Access Act. Section 1 of the Language Access Plan sets the stage for the plan by providing an overview of IPCB and establishing the purpose, goals, and guiding principles that anchor the Language Access Plan. The sections that follow, Sections 2 to 7, address specific areas of language access implementation. Each area of implementation is addressed in two distinct parts, which include:

1. **Overview of Standard** (or Implementation Area): A brief description of the standard based on federal guidance and the Language Equity and Access Act.
2. **Current IPCB Systems and Practices:** A description of IPCB's current practices, existing infrastructure, and/or progress to date in relation to the standard Implementation Goals and a 5-Year Action Plan is provided to support agency implementation:

Implementation Goals: provides an overview of the overarching goals IPCB will pursue to meet compliance objectives

5-Year Action Plan: a list of detailed time-bound action items to be completed by IPCB in three phases over an implementation period of five years:

- a. Phase 0 (Year 0)
- b. Phase I (Year 1)
- c. Phase II (Years 2 and 3)
- d. Phase III (Years 4 and 5)
 - i. The timeframe for a phase is subject to modification by IPCB.

IPCB ROLE

IPCB is an independent agency created in 1970 by the Environmental Protection Act (Act). Under the Act, the IPCB has two major responsibilities: determining, defining, and implementing environmental control standards for the State of Illinois, and adjudicating complaints that allege non-criminal violations of the Act.

The IPCB also reviews appeals arising from permitting and other determinations made by the Illinois Environmental Protection Agency (“IEPA”), as well as pollution control facility siting determinations made by units of local government.

The IPCB is made up of five Members with a current full-time staff of approximately 20. The IPCB’s organizational chart can be found at Section 2175.Appendix A of the IPCB’s [Title 2 administrative rules](#). The IPCB has two main offices, Chicago and Springfield.

The IPCB website is: <https://pcb.illinois.gov/>

The IPCB Language Access Coordinator is:

Bruce Bennett
2520 W. Iles Ave.
Springfield, IL 62704
217-524-8512
bruce.bennett@illinois.gov

The IPCB has two offices located at the following addresses

2520 W. Iles Ave	60 E. Van Buren St., STE 630
Springfield, IL 62704	Chicago, IL 60605

The policy of the IPCB is to provide timely meaningful access for Limited English Proficient (“LEP”) persons to all IPCB programs and activities. All personnel shall provide free language assistance services to LEP individuals whom they encounter or whenever a LEP person requests language assistance services. All personnel will inform members of the public that language assistance services are available free of charge to LEP persons and that the IPCB will provide these services to them.

The IPCB, currently, does not have in-house assets to provide for assistance to LEP persons. The IPCB will continue to work with the Governor’s office, legislative offices, and CMS personnel to secure resources to provide in-house assets.

IPCB staff will take reasonable steps to provide language assistance services to LEP individuals when encountered or requested by an LEP individual. IPCB staff, at the point of initial contact with a LEP individual will work to obtain the most applicable language assistance service. Identifying the language service need will include the following:

1. Self-identification by the LEP individual or a companion;
2. If multilingual staff or an interpreter is available, utilizing the individual to determine the LEP individual's primary language;
3. Using the "I Speak" language identification card.

1.2 LANGUAGE ACCESS PLAN LEGAL BASIS AND PURPOSE

PURPOSE AND GOALS

This Language Access Plan aims to provide guidance to IPCB staff and establish a roadmap to support meaningful access to the department's services, programs, and opportunities for individuals with LEP. The Language Access Plan also seeks to align the department's efforts and bring IPCB into compliance with Illinois' Language Equity and Access Act (Public Act 103-0723), 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 prohibits 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 State of Illinois' Language Equity and Access Act (Public Act 103-0723)

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 on the basis of race, color, or national origin in any program or activity receiving federal financial assistance. As a recipient of federal financial assistance, the [Department/Agency] is bound by Title VI of the Civil Rights Act of 1964 (Title VI), 42 U.S.C. §§ 2000d-2000d-7,

Illinois Pollution Control Board Language Access Plan

and its implementing regulation, 45 C.F.R. Part 80, which prohibits discrimination based on race, color, or national origin (which includes Limited English Proficiency).

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, 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

Signed into law by Governor Pritzker in 2024, the Language Equity and Access Act 2024 aims to ensure that all residents can access state information, programs, and services equitably, and that limited English proficiency does not prevent anyone from fully participating in civic life.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 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.

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

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

³ See *Language Equity and Access Act*, Pub. Act 103-0723.

Under the Act, the 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, and translate vital documents and provide qualified interpretation services for LEP populations.

GUIDING PRINCIPLES

In accordance with federal and state requirements, including the Illinois Language Equity and Access Act (Public Act 103-0723), this Language Access Plan provides a framework for ensuring IPCB can deliver timely and meaningful language assistance services to IPCB constituents with LEP. IPCB is committed to providing equitable language access to its services, programs, and activities for all individuals, regardless of the language they use. IPCB will operationalize this commitment to language access by:

- Designating a Language Access Coordinator who is responsible for overseeing the development and implementation of the Language Access Plan.
- Serving all individuals with LEP and providing accurate, timely, and effective communication, including oral and written language services needed to assist persons 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 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 persons with LEP the agency serves, the policy and programmatic actions implemented to ensure meaningful access, and the metrics used to measure compliance with the Language Equity and Access Act. This assessment will be informed by the federally recognized four-factor analysis, which considers the number or proportion of persons with LEP served, the frequency and context, the nature and importance of services provided, and the agency's available resources and costs.
- Strengthening IPCB's capacity to develop and distribute multilingual content and expanding access to translated vital documents and other resources. Translation of vital records will be prioritized with guidance provided by ONA. The IPCB 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 supporting efforts to meet language access compliance standards. This includes collecting and reporting data on how to use interpretation and translation vendor services, including volume, language type, and service type. IPCB will maintain a complaint and review process and ensure timely resolution.
- Provide ongoing employee development and training to maintain well-trained bilingual employees and general staff. IPCB will also collect and report data on bilingual staff roles, language certifications, and language capacity across its workforce.
- Ensuring the Language Access Plan and related materials are publicly available through IPCB's website and other accessible formats.

DEFINITIONS

- **State Agency:** any State of Illinois agency, board, or commission, directly responsible to the Governor, that provides direct or indirect services, resources, programs, information, data, policies, instructions, or activities to the public, Funded Entities, and staff.
- **Tier I State Agency:** State Agencies that have primary responsibilities that involve providing direct or indirect services and information to the public and have a relatively large staff, budget, and operational scope.
- **Tier II State Agency:** State Agencies that have responsibilities that involve providing direct or indirect services and information to the public and/or have a relatively medium-to-small staff, budget, and/or operational scope.
- **Tier III State Agency:** State Agencies that do not have primary responsibilities that involve providing direct or indirect services and information to the public, though they may provide information to the public.
- **Coordinating Entity:** the Language Access Program, housed in the Office of New Americans within the Office of the Governor as the entity assigned to coordinate the efforts of the State of Illinois's State Agencies to provide meaningful language access to individuals with LEP in accordance with the Language Equity and Access Act
- **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.
- **Limited English Proficiency (LEP):** the inability or difficulty to understand or to effectively express oneself in spoken or written English as a result of one's national origin, and the individual has not developed fluency in the English language.
- **Individuals with LEP:** individuals who self-identify as speaking English less than "very well" according to the U.S. Census American Community Survey.
- **Language of Lesser Diffusion:** any language used within a distinct geographic area, such as a city, county, or state, where the population of speakers is relatively small.

Illinois Pollution Control Board Language Access Plan

- **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. Please see Meaningful Language Access below.
- **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.
- **Digital Language Access:** the utilization of technology to guarantee that individuals with LEP can understand and engage with digital content in their preferred language. This includes the use of tools such as translation applications, multilingual websites, and various digital resources, all of which aim to enhance information accessibility for people, regardless of language disparities.
- **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.
- **Statewide Manager for Language Access Program:** staff of the Coordinating Entity tasked with coordinating and overseeing all language access implementation statewide and across all Covered and Funded Entities, and overseeing the Language Access Coordinators.
- **Language Access Coordinator (LAC):** staff of a State Agency tasked with coordinating and overseeing the entity's language access implementation activities and coordinates and oversees the Language Access Liaisons to ensure that language access information is shared across all state agency programs and divisions.
- **Language Access Liaison (LAL):** staff of a division, program, or Funded Entity tasked with coordinating and overseeing the entity's language access implementation activities, 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.
- **Compliance Evaluation Framework:** an evaluation methodology involving the Language Assessment Rubric and Reporting Tool which the Statewide Manager for Language Access will use to monitor the compliance of State Agencies.
- **Interpretation:** the act of listening to a communication in one language (source language) and orally converting it to another language (target language) while retaining the same meaning. See also Oral Language Services.
- **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. See also Interpretation.

- **Multilingual Staff:** staff member who has demonstrated proficiency in one or more language other than English and is formally assigned and fairly compensated to either provide language assistance services such as interpretation and/or translation to individuals with LEP, or serve in a policy, resource, or advisory role to provide their cultural and linguistic expertise.
- **Language Service Provider (LSP):** a vetted contractor/vendor contracted to perform language assistance services, such as interpretation and/or translation, for individuals with LEP.
- **Four-Factor Analysis:** a framework intended to aid recipients of federal financial assistance with conducting an individualized assessment of their programs and activities to help them prioritize language access services.
- **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.
- **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.
- **Vital Documents:** public-facing written materials, whether in paper or electronic format and made available on any platform (including websites), that are created, issued, or distributed by a State Agency to communicate with the public. These documents contain information that affects an individual’s access to, retention of, termination of, or exclusion from program services or benefits; are required by law; or serve to: Inform the public about rights, responsibilities, rules, services, resources, or events; allow individuals to apply for or participate in programs or benefits; notify individuals about their eligibility, participation, or benefits; and provide instruction, guidance, or complaint submission processes.

SECTION 2: NEEDS ASSESSMENT

Illinois is home to a diverse population with cultural and linguistic backgrounds from around the world. To support IPCB in determining and prioritizing language assistance services, the Language

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

Illinois Pollution Control Board Language Access Plan

Access Plan includes a Needs Assessment that identifies the languages spoken by individuals with languages other than English served or likely to be served by IPCB.

A four-factor analysis is used in this section as a framework to determine the language services IPCB needs to prioritize to meet the needs of individuals with limited English proficiency. 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 limited English proficiency
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 limited English proficiency and with LEP who may need language services, as well as the types of services IPCB provides that the general public and potential individuals with LEP would access.

2.1 FOUR-FACTOR ANALYSIS

FACTOR 1

Overview of Standards

Limited English Proficient Population Data Collection and Analysis assesses the number or proportion of individuals with limited English proficiency that could be served by or could encounter IPCB's services.

The Illinois Language Equity and Access Act requires each State agency to conduct an individualized assessment to determine the adequacy of its Language Access Plan. This assessment must consider the frequency with which persons with LEP come in contact with services, programs, or activities provided by the 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 agency Language Access Plans.

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>

The Language Access Plan 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 IPCB 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 IPCB Systems and Practices

In 2025, IPCB is using the following findings from a demographic analysis⁶ conducted by the University of Illinois Chicago in partnership with the Office of New Americans on the State's individuals with limited English proficiency and individuals with LEP:

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

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://arcg.is/1Py4n0>.

Illinois Pollution Control Board 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 thousand are located in townships across the state and are often located near metro areas such as St. Louis, Springfield, Champaign, and Rock Island. There are also notable populations in relatively rural townships in 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, for the year 2023, shows about 1,082,000 persons, for a gain of some 82,000.

FACTOR 2

Overview of Standard

Language Encounters Data Collection and Analysis assesses the frequency with which limited English proficient (LEP) individuals encounter IPCB's services, programs, or activities.

The Illinois Language Equity and Access Act requires State agencies to conduct an individualized assessment as part of its Language Access Plan 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 IPCB's ability to identify language access needs and ensure meaningful access.

In order to ensure that all IPCB encounters with individuals with LEP across programs and services are collected in a comprehensive and ongoing manner, IPCB will:

- 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; and
- 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 persons with LEP.

Current IPCB Systems and Practices

Due to the minimal interactions of the IPCB with LEP individuals, the IPCB will track this information using a spreadsheet. Any interaction with a LEP individual will be reported to the Language Access Coordinator. The Language Access Coordinator will log the date of the interaction, location, method of communication to the agency (e.g., in-person, phone, or email), language spoken, and what the individual needed from the IPCB.

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 IPCB.

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

To ensure meaningful access to critical and urgent information and services, IPCB will outline procedures for prioritizing language assistance for vital and urgent information and activities. IPCB will review all services and information and will prioritize language assistance for programs, activities, services, or information that, if not understood by individuals using languages other than English, could have immediate and/or severe impacts.

Current IPCB Systems and Practices

The IPCB decides cases and establishes rules to restore and protect the environment. In doing so, the Board provides a public forum where interested citizens can actively participate in our State's environmental decision-making. A majority of the IPCB's interaction with the public is through in-person at board meetings and hearings and through email. The IPCB will prioritize services for individuals using languages other than English by utilizing telephonic interpretation, in-person or document translation services, and translation of vital documents.

FACTOR 4

Overview of Standard

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

The Illinois Language Equity and Access 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. Based on the assessment of resources, IPCB will identify efforts to support cost-savings and cost-sharing when/if needed. Such efforts may include sharing resources with other departments and agencies and/or using technology to support the delivery of language assistance services.

Current IPCB Systems and Practices

The IPCB will monitor the ongoing cost of language assistance by documenting the annual cost spent on utilizing language assistance services. Currently, the IPCB does not have an in-house translator for any language assistance. The IPCB currently utilizes the state procured services for telephonic, in-person, and document translations. The IPCB will also work with CMS personnel and other agencies to utilize language assistance resources available. The IPCB's current budget and state procured resources allow us to meet the current language assistance service demand. However, if demand increases or if state procured services are removed then we will address the additional need with the Governor's office and General Assembly to ensure we meet the demand for language assistance services.

SECTION 3: STAFFING AND COORDINATION

Overview of Standards

The Illinois Language Equity and Access Act outlines the requirements for each State agency to designate a Language Access Coordinator who is responsible for overseeing the development and implementation of the agency's language access plan. The Language Access Coordinator Will support ongoing compliance by partnering with ONA to ensure coordinated implementation and compliance with language access requirements.

To ensure adequate staffing to support the development, management, and oversight of the language access activities, and consistent with the Language Equity and Access Act's directive to ensure adequate staff of bilingual employees, IPCB will establish internal roles to implement its Language Access Plan. These roles include a Language Access Coordinator and may also include a Language Access Liaison within divisions or programs to support localized implementation and coordination of language assistance services, in alignment with national language access best practices.

Illinois Pollution Control Board Language Access Plan

The Illinois Language Equity and Access Act 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.

Currently, the IPCB does not have programs and services in partnership with a wide network of grantees and funded entities. However, in the future if IPCB does have applicable programs and services, IPCB will take affirmative steps to ensure those entities fulfill language access obligations to support monitoring and accountability.

SECTION 4: LANGUAGE ASSISTANCE SERVICES

IPCB is committed to taking reasonable steps to ensure meaningful communication and access to information for IPCB's users with LEP. The Language Assistance Services section outlines the types of language assistance IPCB currently provides, as well as the services IPCB plans to provide to support meaningful communication and participation for individuals with LEP and who are limited English proficient. The language assistance services outlined in the Language Access Plan include oral interpretation services, virtual interpretation services, in-language assistance with multilingual staff, print and online translation services, and the development of other multilingual media content.

This section outlines the roles and responsibilities of IPCB's language access staff, including Language Access Coordinators and Language Access Liaisons, who are responsible for monitoring and ensuring the implementation of language assistance services according to the Language Access Plan across the agency.

4.1 LANGUAGE ASSISTANCE SERVICES PLAN

LANGUAGE ACCESS SERVICES

1. LANGUAGE NEED IDENTIFICATION

- **Overview of Standard**

The Language Access Plan requires State Agencies to develop clear policy and programmatic actions to ensure meaningful access. It is national language access

Illinois Pollution Control Board Language Access Plan

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, consistent with State Agencies' obligations to ensure accurate, timely, and effective communication.

- **Current IPCB Systems and Practices**

The IPCB utilizes the I-Speak resource card to assist in identifying which language the individual is speaking. Each IPCB office has an I-Speak card placed at the public entrance. The IPCB employee will show the card to the individual and indicate for them to point to the language they speak. The employee will then read the English interpretation underneath that identified language. This will help them to identify what language to select when contacting the interpreter. The employee will then contact Propio, the state selected telephonic interpretation service, to assist in communication between the IPCB employee and the LEP individual.

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

- **Overview of Standard**

The Illinois Language Equity and Access Act requires State Agencies to ensure individuals with LEP have access to competent, timely, and effective interpretation services when interacting with agency staff, programs, and services. Agencies are required to provide meaningful access. Using trained and qualified interpreters, in alignment with standards developed by ONA, supports State agency compliance and ensures meaningful access.

- **Current IPCB Systems and Practices**

The IPCB currently utilizes the state procured vendors of Propio for telephonic interpretation and Multilingual Connections for in-person interpreter and document translation. Propio is utilized if the IPCB receives an in office LEP individual or a phone call from an LEP individual. Multilingual Connections is utilized when a translator is needed for a Board meeting or hearing or when IPCB documents are needed to be translated. Both of these services provide a high-quality professional

Illinois Pollution Control Board Language Access Plan

level of language assistance. These services provide timely access and highly qualified and trained interpreters.

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

- **Overview of Standard**

The Illinois Language Equity and Access Act requires State Agencies to ensure individuals with LEP have access to competent, timely, and effective interpretation services when interacting with agency staff, programs, and services.

- **Current IPCB Systems and Practices**

The IPCB currently utilizes the state procured vendors of Propio for telephonic interpretation and Multilingual Connections for in-person interpreter and document translation. Propio is utilized if the IPCB receives an in office LEP individual or a phone call from an LEP individual. Multilingual Connections is utilized when a translator is needed for a Board meeting or hearing or when IPCB documents are needed to be translated. Both of these services provide a high-quality professional level of language assistance. These services provide timely access and highly qualified and trained interpreters.

4. EMPLOYING/ UTILIZING BILINGUAL OR MULTILINGUAL STAFF

- **Overview of Standard**

The Illinois Language Equity and Access Act require the Governor's Office of New Americans, 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 Language Equity and Access 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 IPCB Systems and Practices**

Currently, the IPCB does not have bilingual positions. The IPCB currently utilizes the state procured vendors of Propio for telephonic interpretation and Multilingual Connections for in-person interpreter and document translation. Propio is utilized if the IPCB receives an in office LEP individual or a phone call from an LEP individual. Multilingual Connections is utilized when a translator is needed for a Board meeting or hearing or when IPCB documents are needed to be translated. Both of these services provide a high-quality professional level of language assistance. These services provide timely access and highly qualified and trained interpreters.

5. TRANSLATION OF VITAL DOCUMENTS AND ONLINE CONTENT

- **Overview of Standard**

The Illinois Language Equity and Access Act requires agencies to ensure that vital documents are translated accurately, completely, and in a timely manner by qualified translators.

- ☒ Translation of vital documents will be in accordance with the Language Equity & Access Act and guidance issued by ONA.

In instances where LEP populations fall below these thresholds but still require meaningful access, agencies must provide written notice in the primary language of the right to oral interpretation of the written material at no cost.

Translation priorities should be guided by the most recent Language Needs Assessment Report and the demographic data of the agency's service population.

- **Current IPCB Systems and Practices**

A vital document is any of the Board's material which is essential to an individual's ability to access the Board's services. Currently the IPCB has the following vital documents available for the public:

- Clerk's Office On-Line (COOL): eFile
- Formal and Informal Complaint Form
- Language Access Complaint Form

Any other publicly available documents requested by an LEP individual will be translated into the language requested. The vital documents are currently available in the following non-English languages: Arabic, Chinese, Hindi, Polish, Spanish, and Tagalog. The IPCB will utilize approved state resources for document translation. Currently, the IPCB is using the state procured vendor Multilingual Connections for document translation. When a document translation is needed, IPCB will contact the state vendor and immediately request the document be translated into the requested language.

Currently the IPCB website is available in the following non-English languages: Arabic, Chinese, Hindi, Polish, Spanish, and Tagalog.

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

• **Overview of Standard**

The Illinois Language Equity and Access Act requires State Agencies to take steps to ensure that digital content is accessible to individuals with LEP. 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, and thresholds outlined in the Language Equity and Access Act.

• **Current IPCB Systems and Practices**

Currently all publicly available materials are available through the IPCB website. The IPCB does not maintain any other digital presence. The vital documents are published on the IPCB website in six non-English languages. Any other documents requested to be translated will be done immediately utilizing the state procured vendor, Multilingual Connections.

SECTION 5: NOTIFICATION OF LANGUAGE ASSISTANCE SERVICES

In addition to providing language assistance services, the Notification of Language Assistance Services section will outline how IPCB can notify the public of language assistance services and provide information on how language assistance services can be requested. Such communication

Illinois Pollution Control Board Language Access Plan

will assist individuals with LEP in understanding the services provided by IPCB, which can increase public trust and confidence.

5.1 NOTIFICATION OF LANGUAGE ASSISTANCE SERVICES PLAN

Overview of Standards

The Illinois Language Equity and Access Act requires State Agencies to ensure that the general public and individuals with LEP are informed of the availability of free interpretation and translation services and how to request them. To meet this requirement, IPCB will provide multilingual public notices in various formats—both digital and physical—to promote broad public awareness. All notices will clearly explain how individuals can request interpretation or translation services and will be made available in the most frequently spoken languages identified through demographic analysis and the State's Language Needs Assessment Report.

Current IPCB Systems and Practices

The IPCB has a notice on its webpage, agendas, and public notices stating the following: "Language assistance is available. Please contact the IPCB Clerk's office at (312) 814-3620 or PCB.Clerks@illinois.gov to request this service."

SECTION 6: LANGUAGE ACCESS TRAINING

IPCB is committed to providing ongoing employment development and training on language access to maintain well-trained bilingual employees, general staff, and all staff who interact with or may interact with individuals with LEP. All staff receive ongoing professional development and training on language access policies, procedures, and responsibilities. This section outlines the type of language access training to provide all IPCB personnel, as well as specific training responsibilities for bilingual or multilingual employees, frontline staff, and other personnel who may interact with individuals with LEP. This section also identifies the timing, frequency, and delivery methods for how training shall be implemented across the agency and its divisions.

6.1 LANGUAGE ACCESS TRAINING PLAN

Overview of Standards

The Illinois Language Equity and Access 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 the IPCB is equipped to deliver effective language assistance services.

Current IPCB Systems and Practices

The language access coordinator will continuously monitor and review the effectiveness of the language access plan. The language access monitor will perform the following:

- Remind staff annually on the use of language access services and perform updated training if needed. It will include but not limited to the following:
 - Review of the language access plan.
 - Ensure I-Speak cards are located near the front entrance of each office.
 - Remind staff of the telephonic and in-person interpretation services available.
 - Remind staff to contact the language access coordinator when an interaction with a LEP individual occurs.
- New hires will be given a copy of the language access plan and proper training related to it.
- Update IPCB staff of any training and news related to the language access plan as directed by the Office of New Americans.

SECTION 7: CONCERN RESOLUTION PROCESS

The Concern Resolution Process Section of the Language Access Plan 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 IPCB 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 IPCB will track the resolution status of complaints to ensure transparency and accountability and coordinate with the ONA when appropriate to support compliance and continuous improvement.

Overview of Standards

Illinois Pollution Control Board Language Access Plan

The Illinois Language Equity and Access Act requires State Agencies to establish and make publicly available a process for individuals with limited English proficiency (LEP) and members of the public to submit concerns related to access to language assistance services. Section 15(b)(5) of the Act requires each State agency to develop an internal complaint and review process specific to the provision of language assistance services. Complaints that are not resolved in a timely or satisfactory manner may be referred to the Governor's Office of New Americans for further review, per Section 30(c) of the Act.

Current IPCB Systems and Practices

Any concerns related to access to language assistance services can be directed to the language access coordinator. A language access complaint form is available for submission to the language access coordinator. This form is printed in the language access plan and is also available on the IPCB website at <https://pcb.illinois.gov/Resources>. It is also available upon request to the language access coordinator. The language access coordinator will review all complaints and immediately take action to resolve them. The language access coordinator will notify the Board Chair of any complaints and will document the process of resolving the complaint.

SECTION 8: MONITORING, EVALUATION, AND REPORTING

The Monitoring, Evaluation, and Reporting section of the Language Access Plan outlines the implementation and procedures IPCB will implement to assess compliance with the Illinois Equity and Access Act and evaluate the effectiveness of this Language Access Plan and its action items. This section will outline current practices and procedures for monitoring and collecting language access data, analyzing language use and language assistance needs, procedures for collecting and participating in community engagement/community feedback sessions to gather input on improvements to the Language Access Plan and language assistance service, and evaluating the quality of language assistance services offered by IPCB.

8.1 MONITORING, EVALUATION, AND REPORTING PLAN

Overview of Standard

In accordance with the Illinois Language Equity and Access Act, IPCB will coordinate with the Governor's Office of New Americans to review and monitor the implementation of its Language Access Plan and ensure ongoing compliance with the Act.

IPCB will conduct an individualized assessment of language assistance needs and patterns of language use on an ongoing basis and incorporate updated data and performance metrics into each new iteration of the Language Access Plan, as required under Section 25(d)(3). The agency will use this information to evaluate the effectiveness of current policies and practices and to inform continuous improvement of language access services.

The plan will include the ongoing review of statewide and agency-specific data on limited English proficient (LEP) populations, including demographic shifts and the identification of new or emerging language needs, as outlined in the State's Language Needs Assessment Report. The monitoring and evaluation plan will also track progress on the implementation of Language Access Plan goals, review expenditures related to language assistance services, and assess whether projected changes in costs require budget adjustments or modifications to service delivery methods. Data will be collected and reviewed using the following methods:

Current IPCB Systems and Practices

The language access coordinator will monitor and review the effectiveness of the plan and make updates as needed. The language access coordinator will perform the following:

- work with staff on how the services are being used.
- will use any feedback provided from the LEP community to improve the plan.
- Will monitor the use of the services, which includes the number of times used, funds, staff time, and response time for the request of services.

The Board will continue to investigate avenues that will allow the Board to be of more assistance to LEP individuals.

SECTION 9: LANGUAGE ACCESS COMPLAINT FORM



IPCB Language Access 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 on the basis of your age, race, sex, disability, national origin, sexual orientation, or any other protected reason, please complete this form and submit to: bruce.bennett@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 person(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 pertaining to your complaint, please attach 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:

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

SECTION 10: APPENDIX

10.1 APPENDIX 1: LIMITED ENGLISH SPEAKERS POPULATION IN ILLINOIS AND BY ILLINOIS COUNTY WEBLINK

[LIMITED ENGLISH SPEAKERS POPULATION IN ILLINOIS AND BY ILLINOIS COUNTY](#)