

2025-2026 Illinois Department of Transportation Language Assistance Plan for Addressing Limited English Proficiency

I. PURPOSE

Illinois is a diverse, multi-cultural state that includes many people who fluently speak languages other than English. If these individuals have a limited ability to read, write, speak, or understand English, they qualify as Limited English Proficient (LEP). Language for LEP individuals can be a barrier to accessing benefits or services, understanding and exercising rights, complying with applicable responsibilities, or understanding other vital information provided by government agencies.

The Illinois Department of Transportation (IDOT or the Department) must reduce language barriers for LEP individuals that may impede their meaningful understanding of important Department activities. Meaningful access means providing language access measures that result in accurate, timely, and effective communication at no cost to the LEP individual. For LEP individuals, meaningful access denotes access that is not significantly restricted, delayed, or inferior as compared to programs or activities provided to English proficient individuals.

IDOT funds and manages transportation projects and services. The opportunity to understand Department activities, provide project or program input, and receive vital information from the Department must be made meaningfully accessible to LEP individuals. IDOT is committed to ensuring the accessibility of these programs and activities to LEP individuals.

The Language Access Plan (Plan) provides guidance to IDOT staff who may interact directly with LEP individuals or whose work involves providing information or services to the public. The Plan provides protocols for identifying LEP individuals, language access measures, how to secure translation and interpretation services, staff responsibilities, and training related to ensuring meaningful access for LEP individuals.

For further questions regarding this Plan, please contact:

Marjorie Espina Hughes
Bureau Chief, Bureau of Civil Rights
Email: marjorie.hughes@illinois.gov
Tel: 312-793-1443

II. AUTHORITY

- A. Title VI of the Civil Rights Act of 1964 – 42 USC 2000d et seq.
- B. Americans with Disabilities Act – 42 USC 12101 et seq.
- C. 28 CFR part 35 et seq. (ADA Title II regulations)
- D. United States Executive Order 13166
- E. Illinois Civil Rights Act of 2003 – 740 ILCS 23/5
- F. Illinois Information Technology Accessibility Act (“IITAA”) – 30 ILCS 587 et seq.

III. DEFINITIONS

- A. “Department” – The Illinois Department of Transportation. Also referred to herein as “IDOT”.
- B. “Effective Communication” – Communication that is sufficient to provide the LEP individual with substantially the same level of access to services or information that would be received by individuals who are not LEP. This covers all media of communication.
- C. “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.
- D. “Language Access Coordinator” – An IDOT employee, who has been designated by the IDOT Secretary or Chief of Staff, to field questions by Departmental staff regarding this Plan, to train staff on the use of this Plan, to regularly update and revise this Plan, and to receive and investigate complaints associated with violations of this Plan.
- E. “Language Access Working Group” – A group led by the Language Access Coordinator composed of representatives from Bureau of Civil Rights, Bureau of Personnel Management, Legal Services and the Secretary or their designee, charged with making revisions and updates to the Plan.
- F. “Language Access Services” – Oral and written language services required for LEP individuals to communicate effectively with staff and ensure meaningful access to, and equal opportunity to fully participate in the programs and activities administered by the Department.
- G. “Limited English Proficient (LEP)” – Individuals whose primary language is not English and who have a limited ability to read, speak, write, or understand English. Individuals may be proficient in English for certain types of communication (e.g., speaking or understanding), but still be LEP for other purposes (e.g., reading or writing).
- H. “Meaningful Access” – Language service that results in accurate, timely, and effective communication at no cost to the LEP individual. For LEP individuals, meaningful access denotes access that is not significantly restricted, delayed, or inferior as compared to programs or activities provided to English proficient individuals.
- I. “Point of Contact” – Instances where IDOT staff and volunteers provide services or service-related information to members of the public.
- J. “Public Engagement” – Any process that: (1) involves the public in identifying and solving challenges and problems and uses public input to make sustainable decisions; (2) educates or informs the public about a topic or issue; or (3) seeks to build meaningful connections and trust with the public through communication and interaction.
- K. “Translation” – The replacement of a word, phrase, or text in one language (source language) with an equivalent- meaning word, phrase, or text in another language (target language).
- L. “Vital Documents” – Paper or electronic written material containing information that is (1) critical for accessing programs, services, benefits, or activities, (2) directly and substantially related to public safety, or (3) required by law.

IV. RESPONSIBILITIES

A. It is the responsibility of the Department to ensure that all individuals have meaningful access to services and information regardless of national origin.

B. It is the responsibility of the Department to provide language translation services to any LEP individuals that need information related to IDOT. Due to the strong possibility of miscommunication, the Department should not rely upon machine translation, informal translation or interpretation services, such as a family member of the LEP individual, or unapproved internet translation services. Due to the need to adhere to privacy laws, the Department should not rely on unauthorized third parties to provide translation or interpretation services.

C. It is the responsibility of the Department to actively identify any LEP individuals.

D. It is the responsibility of the Department to let LEP individuals know that they are entitled to receive language access services. The Department shall ensure that any outreach or education – including its website – includes information that apprises LEP individuals of their right to receive language access services from the Department. The Department shall prominently display a language access document or poster at each District location. This document or poster shall be visible to any member of the public that enters an IDOT office.

E. It is the responsibility of the Department to enter into a contract with a vendor to provide translation and interpretation services in-person, telephonically, or via the internet. The Department may attempt to obtain short-term translation or interpretation services through use of a temporary contract or an inter-governmental agreement.

F. It is the responsibility of the Department to maintain on staff a Language Access Coordinator. The Language Access Coordinator will be designated as the Department's Title VI Specialist. In the event the Title VI Specialist position is vacant, the Bureau Chief, Civil Rights will be the designee.

G. The Language Access Coordinator shall, at least once per calendar year, update and revise the Plan. This process involves assessing all points of contact IDOT has or may have with LEP individuals, determining the number or frequency of LEP client contact with the Department, determining the predominant non-English languages used by LEP individuals, identifying the language assistance services being utilized by the Department and whether additional such services are needed to facilitate effective communication for LEP individuals, identifying all IDOT points of contact with prospective LEP individuals, and any other tasks that would be reasonably necessary to maintain the Plan's compliance with applicable State and Federal laws. The Language Access Coordinator shall create a Language Access Working Group to assist them with updating and revising the Plan. The Language Access Coordinator shall investigate any complaints associated with violations of the Plan and present findings to the Language Access Working Group and any recommended actions to reasonably address a complaint. 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.

H. It is the responsibility of the Language Access Coordinator to compile a list of IDOT forms, applications, and other documents that are commonly utilized by IDOT staff. The Language Access Coordinator shall, after identifying said documents, take reasonable steps to ensure that said documents are translated into Spanish, Polish, and Mandarin Chinese, at a minimum, and made available on the IDOT SharePoint server.

H. It is the responsibility of the Language Access Coordinator to document and track all requests for and uses of language access services. The Language Access Coordinator shall also document and track all complaints associated with alleged violations of the Plan, and any actions taken to address the alleged violations.

I. It is the responsibility of the Language Access Coordinator to identify any shortcomings with IDOT's identification of LEP individuals or with the language access services being utilized by the Department. The Language Access Coordinator shall, promptly upon identifying any shortcomings, appraise the OBWD Director of these and make recommendations on how the Department can address the problems.

J. It is the responsibility of the Language Access Coordinator to train IDOT staff on the use of the Plan, including how to identify LEP individuals and the language access services available to the Department.

Training will be conducted on the Plan and the process for supporting LEP individuals, including oral translation and translation of documents, on IDOT's learning management system. The training was first offered in winter 2023-24. Development of a recurring standalone Language Access Plan refresher training for IDOT employees is underway and will include specific details around using the Propio interpreter and Multilingual translation services. Training on the Plan will also include the following information: the importance of providing meaningful access to information and services; how to effectively and respectfully communicate and interact with LEP individuals; IDOT's policies and procedures related to providing language access services, including protocols for handling various encounters with LEP individuals; how to identify, assess, and record the language preferences of LEP constituents at the first point of contact; procedures to request and work with an interpreter, including when to use an interpreter; and what type of translated information is available to constituents and where it can be found.

In addition, the Department also covers an overview of the LAP as a component of every new hire's New Employee Orientation. This training involves background on the LAP, available interpreter services for employee use, and the employee's role in implementing the LAP as part of their job duties.

If the Title VI Coordinator learns that a Bureau or District requires additional training due to its frequency of contact with LEP individuals, the Title VI Coordinator will work with the Bureau Chief, Regional Engineer, or other department leader to arrange specialized training.

V. IDENTIFICATION OF LEP INDIVIDUALS & THE FOUR-FACTOR ANALYSIS

- A. Title VI and its regulations require IDOT to take reasonable steps to ensure meaningful access to the Department's information and services. What constitutes reasonable steps to ensure meaningful access is contingent on a four-factor analysis established by the U.S. Department of Justice.
- B. The four-factor analysis is an individualized assessment that should be applied to all IDOT districts, offices, programs, and activities to determine what reasonable steps must be taken to ensure meaningful access for LEP individuals. This Language Access Plan does not provide a four-factor analysis for IDOT's individual offices, districts, programs and activities.
- C. The Language Access Coordinator, Title VI Liaisons, and district leadership are responsible for ensuring the four-factor analysis is conducted as needed for their programs and activities. The four factors are described in detail below, including guidance for weighing each factor.

FOUR-FACTOR ANALYSIS

Factor #1: The number or proportion of LEP individuals eligible to be served or likely to be encountered

The greater the number or proportion of LEP individuals from a particular language group served or encountered in the eligible service population, the more likely language access services are necessary. Ordinarily, “individuals eligible to be served or likely to be encountered” by a program or activity are those who are in fact, served or encountered in the eligible service population. This population will be program-specific and includes people who are in the program’s geographic area.

Offices, districts, and programs should first examine their prior experiences with LEP individuals and determine the breadth and scope of language access services needed. It is also important to include LEP populations that are eligible beneficiaries of IDOT programs, activities, or services but may be underserved because of existing language barriers.

Offices, districts, and programs unable to identify and examine prior experiences with LEP individuals should use reliable external data sources to determine the number or proportion of individuals likely to be served or encountered, such as census data for the geographic service area.

LEP individuals are defined as individuals 5 years or older who self-identify as speaking English less than “very well.” According to the U.S. Census Bureau 2021 American Community Survey estimates, Illinois’s population of individuals five years or older is 11,967,918. Of this population, 10,922,746 (or approximately 91.3%) speak English only or speak English “very well.” 1,045,172 (or approximately 8.7%) speak English less than “very well.”

The census divides primary languages other than English into four major language groups:

1. Spanish: includes Spanish, Spanish Creole, and Ladino.
2. Other Indo-European languages: includes most languages of Europe and the Indic languages of India. These include the Germanic languages, such as German, Yiddish, and Dutch; the Scandinavian languages, such as Swedish and Norwegian; the Romance languages, such as French, Italian, and Portuguese; the Slavic languages, such as Russian, Polish, and Serbo-Croatian; the Indic languages, such as Hindi, Gujarati, Punjabi, and Urdu; Celtic languages; Greek; Baltic languages; and Iranian languages.
3. Asian and Pacific Island languages: includes Chinese; Korean; Japanese; Vietnamese; Hmong; Khmer; Lao; Thai; Tagalog or Pilipino; the Dravidian languages of India, such as Telugu, Tamil, and Malayalam; and other languages of Asia and the Pacific, including the Philippine, Polynesian, and Micronesian languages.
4. All Other languages: includes Uralic languages, such as Hungarian; the Semitic languages, such as Arabic and Hebrew; languages of Africa; native North American languages, including the American Indian and Alaska native languages; and indigenous languages of Central and South America.

Of the population of 11,967,918 individuals five years or old in Illinois, 1,621,682 (or approximately 13.6%) spoke Spanish. Of this population, 639,357 (or approximately 39.4%) spoke English less than “very well.”

Of the population of 11,967,918 individuals five years or old in Illinois, 673,542 (or approximately 5.6%) spoke other Indo-European languages. Of this population, 222,859 (or approximately 33.1%) spoke English less than “very well.”

Of the population of 11,967,918 individuals five years or old in Illinois, 363,789 (or approximately 3%) spoke Asian or Pacific Island languages. Of this population, 145,023 (or approximately 39.9%) spoke English less than “very well.”

Of the population of 11,967,918 individuals five years or old in Illinois, 125,174 (or approximately 1%) spoke another language. Of this population, 37,933 (or 30.3%) spoke English less than “very well.”

Individuals who have identified themselves as speaking English less than “very well” are considered to be LEP based on their limited ability to read, write, speak, or understand English.” This deficiency makes it difficult for them to have meaningful access to programs that may be offered by IDOT.

	Illinois			
	Total		Percent	
Label	Estimate	Margin of Error	Estimate	Margin of Error
Population 5 years and over	11,967,918	±2,466	(X)	(X)
Speak only English	9,183,731	±28,902	76.7%	±0.2
Speak a language other than English	2,784,187	±28,959	23.3%	±0.2
SPEAK A LANGUAGE OTHER THAN ENGLISH				
Spanish	1,621,682	±19,196	13.6%	±0.2
5 to 17 years old	341,912	±8,919	2.9%	±0.1
18 to 64 years old	1,136,494	±13,139	9.5%	±0.1
65 years old and over	143,276	±3,373	1.2%	±0.1
Other Indo-European languages	673,542	±20,210	5.6%	±0.2
5 to 17 years old	86,899	±6,528	0.7%	±0.1
18 to 64 years old	458,429	±14,737	3.8%	±0.1
65 years old and over	128,214	±7,373	1.1%	±0.1
Asian and Pacific Island languages	363,789	±12,057	3.0%	±0.1
5 to 17 years old	40,738	±4,148	0.3%	±0.1
18 to 64 years old	258,074	±8,933	2.2%	±0.1
65 years old and over	64,977	±3,048	0.5%	±0.1
Other languages	125,174	±9,815	1.0%	±0.1
5 to 17 years old	23,537	±4,283	0.2%	±0.1
18 to 64 years old	88,622	±6,610	0.7%	±0.1
65 years old and over	13,015	±2,338	0.1%	±0.1

	Speak English less than "very well"		Percent speak English less than "very well"	
Label	Estimate	Margin of Error	Estimate	Margin of Error
Population 5 years and over	1,045,172	±21,758	8.7%	±0.2
Speak only English	(X)	(X)	(X)	(X)
Speak a language other than English	1,045,172	±21,758	37.5%	±0.6
SPEAK A LANGUAGE OTHER THAN ENGLISH				
Spanish	639,357	±15,410	39.4%	±0.8
5 to 17 years old	68,775	±5,903	20.1%	±1.7
18 to 64 years old	473,655	±12,375	41.7%	±0.9
65 years old and over	96,927	±4,184	67.7%	±2.4
Other Indo-European languages	222,859	±9,325	33.1%	±1.0
5 to 17 years old	13,892	±2,502	16.0%	±2.6
18 to 64 years old	140,470	±7,481	30.6%	±1.3
65 years old and over	68,497	±5,192	53.4%	±2.3
Asian and Pacific Island languages	145,023	±8,652	39.9%	±1.8
5 to 17 years old	8,834	±2,069	21.7%	±4.4
18 to 64 years old	98,604	±6,948	38.2%	±2.1
65 years old and over	37,585	±2,815	57.8%	±3.5
Other languages	37,933	±4,152	30.3%	±2.5
5 to 17 years old	3,901	±1,258	16.6%	±5.8
18 to 64 years old	28,275	±3,192	31.9%	±3.1
65 years old and over	5,757	±1,527	44.2%	±6.8

Source: 2021 American Community Survey Estimates

Factor #2: The frequency with which LEP individuals come in contact with the program

Offices, districts, and programs should assess, as accurately as possible, the frequency with which they have or should have contact with LEP individuals from different language groups seeking access. If LEP individuals access a program or service on a regular, consistent basis, then that program or service provider has greater language access duties than a program or service whose contact with LEP individuals is unpredictable or infrequent. However, offices, districts, and programs with infrequent or unpredictable interactions with LEP individuals must be prepared to provide language access services to LEP individuals.

In applying this factor, offices, districts, and programs should also consider whether outreach to LEP individuals could increase the frequency of contact with LEP language groups and remain mindful of the data analysis conducted under Factor #1 to identify the proportion of LEP population present in the service area. In anticipation of public-facing events (e.g., community engagement events, public meetings, etc.), IDOT will evaluate the potential participation by LEP populations and enlist the appropriate language interpretation or translation services in response.

The IDOT Bureau of Civil Rights enlisted Propio Language Services to support its language interpretation needs. Information about utilizing this account will be distributed to all IDOT employees this year in a mandatory training developed by the Bureau of Civil Rights. Propio will track the quantity of interpreter services requests made and completed by IDOT staff and report this data to IDOT regularly. IDOT will be able to more fully report on usage data when this plan is next updated. The mandatory training will also instruct employees on how to report other contacts with LEP individuals (e.g., ad hoc

interpreter or translation encounters conducted by IDOT staff) by contacting the Title VI Coordinator or Title VI Specialist who will track this data.

Factor #3: The nature and importance of the program, activity, or service provided by the program to people's lives

The more important the activity, information, service, or program, or the greater the possible consequences of the contact to the LEP individuals, the greater the need for language access services. Offices, districts, and programs must determine whether denial or delay of access to services or information could have serious implications for the LEP individual. Generally, programs providing information and services related to accessing benefits, opportunities, or rights are considered high importance.

As part of its analysis, an office, district, or program may determine necessary language access measures include the translation of vital documents into the language of each LEP group that is frequently encountered, eligible to be served, or likely to be affected. Vital documents are paper or electronic written material containing information that is: (1) critical for accessing programs, services, benefits or activities; (2) directly and substantially related to public safety; or (3) required by law. Whether a document (or the information it solicits) is “vital” may depend upon the importance of the program, information, encounter, or service involved, and the consequence to the LEP person if the information in question is neither accurate nor timely.

Examples of vital documents in the U.S. DOT LEP Guidance include: emergency transportation information, notices of public hearings regarding proposed transportation plans or projects, notices advising LEP individuals of free language assistance, and applications or instructions on how to participate in a program or activity or receive benefits or services.

IDOT has identified a list of vital documents that it is currently in the process of translating. For the full list, please contact DOT.CivilRights@illinois.gov. Documents will be translated using a vendor, such as Multilingual. IDOT will develop a language access complaint form and make it available to the public in the event that a member of the public believes that IDOT has not made appropriate documents available in their language. The complaint form may be obtained by emailing DOT.CivilRights@illinois.gov.

Visitors of IDOT’s website will find that it offers language translation for Arabic, Hindi, Polish, Chinese, Spanish, and Tagalog through the Illinois Department of Innovation and Technology’s translation portal.

Factor #4: The resources available to IDOT and cost of language access

IDOT’s available resources and the costs of providing language access services may impact the steps taken to provide meaningful access to LEP individuals. Generally, the department should have sufficient resources to provide meaningful access through reasonable language access measures. However, language access measures may cease to be reasonable where the costs imposed substantially exceed the benefits. Offices, districts, and programs should ensure any resource limitations are documented and explained before using this factor as a reason to limit language access.

The four-factor analysis necessarily implicates a spectrum of language access measures. For instance, written translations can range from translation of an entire document to translation of a short description of the document, and interpretation services may range from using telephone-based interpretation services to providing in-person interpretation at a public event. Language access measures should be based on what is necessary and reasonable after considering the Four-Factor Analysis. Offices, districts, and

programs should proactively identify how to provide language access services efficiently and cost-effectively while ensuring meaningful access to LEP individuals.

IDOT has allocated funds to support outside vendors that will provide translation and interpretation services, as described above. It has also obligated funding to the printing and distribution of LEP notices and available services. The Department will continue to monitor whether further funding is required to advance implementation of the Plan.

VI. LANGUAGE ASSISTANCE SERVICES

At first contact with a prospective LEP individual, the Department shall take all reasonable steps to assess whether the individual needs language access services. These steps include the following:

A. The Department shall ask professional, open-ended questions of the LEP individual to determine the individual's ability to speak or understand English. Open-ended questions are those that require a complex, non-static response; these are typically of the "who," "what", "when," "where," and "why" variety. Examples of open-ended questions include:

1. "What kind of assistance do you need from IDOT?"
2. "Why do you need this assistance?"
3. "What is your understanding of this program?"

B. The Department shall assess the type and nature of language access services required. This includes a determination of the language or languages in which the individual is proficient, and whether the individual needs translation services, interpretation services, or both. The Department should utilize an "I speak ... [language]" identification card, document, or poster, if available. A sample "I speak..." form can be found at:

<http://justice.gov/crt/lep/resources/ISpeakCards2004.pdf>

1. Although use of informal interpreters – such as family members, machine interpretation, or using the internet – should be avoided, the Department may utilize such for purposes of assessing an individual's LEP status.
 2. The Department should document these steps in a file and, if language access services are needed, note the type and nature of services needed. The Department shall send an e-mail notification to the Language Access Coordinator if it was determined that language access services were needed. The notification shall include the LEP individual's name, IDOT service requested or utilized, the individual's language of choice, and the specific language access services needed.
- C. Once the Department determines that prospective LEP individual has limited English proficiency and has determined which types of translation or interpretation services are needed, the staff member shall obtain appropriate language access services for the individual.

D. If interpretation services are needed, the Department shall take the following steps:

1. A staff member shall contact the telephonic or internet language interpretation service provider with whom IDOT has contracted for this purpose. IDOT has contracted with Propio to provide interpreter services. These services can be accessed by calling 1-217-867-3023 and entering the account # 18354. For Spanish interpretation, the staff member should press 1. For all other languages, the staff member should press 8.
2. In the event of an emergency, the staff member may utilize an LEP individual's family member or unauthorized internet translation software to provide temporary translation services. An emergency is defined as a situation where the LEP individual's person or property are in imminent risk of harm. The staff member should only utilize the family member or unauthorized internet interpretation software until the emergency has been addressed.
3. The staff member or supervisor should direct any questions in utilizing these steps to IDOT's Language Access Coordinator.
4. The Department shall document these steps and send an e-mail notification to the Language Access Coordinator. The notification shall include the LEP individual's name, IDOT service requested or utilized, the individual's language of choice, and the specific interpretation services utilized.

E. If translation services are needed, the Department shall take the following steps:

1. The staff member shall contact the translation service provider with whom IDOT has contracted for this purpose.
2. If the Department has not yet entered into such a contract, then the staff member shall contact his or her supervisor and relay the LEP individual's need for translation services. The supervisor shall contact the Bureau of Business Services Procurement Section to ensure that temporary translation services can be obtained for the LEP individual's need for translation services.
3. In the event of an emergency, the staff member may utilize the LEP individual's family member or unauthorized internet or machine translation software to provide temporary translation services. The staff member should only utilize the family member or unauthorized internet or machine translation software until the emergency has been addressed.
4. The staff member or supervisor should direct any questions in utilizing these steps to IDOT's Language Access Coordinator.
5. The Department shall document these steps and send an e-mail notification to the Language Access Coordinator. The notification shall include the LEP individual's name, IDOT service requested or utilized, the individual's language of choice, and the specific translation services utilized.



November 26, 2025

Marjorie Espina Hughes
Bureau Chief, Civil Rights,
IDOT Office of Business &
Workforce Diversity

Date