



Illinois Department on Aging
Language Access Plan
2022-2024

Table of Contents

- I. Introduction
- II. Agency Description
- III. Federal State and Local Laws
- IV. IDoA Language Access Services
- V. Points of Contact
- VI. Language Assistance Service Protocols
- VII. Notice to Public
- VIII. Next Steps
- IX. Complaint Procedure
- X. Appendices
 - a. Appendix I: Vital Documents List.

Illinois Department on Aging
Language Access Plan
2022-2024

I. Introduction

In the Aging Community we have discovered that language barriers can have a marked effect in intercultural service encounters for ESL (English as a Second Language) Aging Customers. ESL aging customers may struggle to communicate what they want or even receive necessary information regarding products or services. Even more important is the effect language barriers can have on an individual's health, such as impacting the ability to enroll in health coverage, follow public health recommendations, communicate with health care providers, and understand treatment plans and services. A key component of health equity is the provision of accessible and meaningful language services to individuals with language barriers. The Illinois Department on Aging (IDoA) defines a Limited English Proficient (LEP) person using the U.S. Department of Health and Human Services definition:

A person whose primary language for communication is not English and who has a limited ability to read, write, speak, or understand English

Illinois Department on Aging's (IDoA) has developed this Language Access Plan (LAP) for the purposes of defining the protocols and procedures to be utilized by IDoA to ensure meaningful and universal access to IDoA sponsored services, programs, and activities on the part of persons who self-identify as having limited English proficiency or preference for materials and services in a preferred language.

In addition to this LAP, IDoA's State Plan on Aging supports the implementation of this LAP. The State Plan commits IDoA to providing culturally appropriate information aligned with national Culturally and Linguistically Appropriate Standards (CLAS) in a variety of formats to Aging adults, their families, and caregivers, considering linguistic and cultural differences.

IDoA is focused on ensuring Illinois' Aging communities and residents have access to services, programs and activities that will enable them to achieve and maintain optimal health and safety. Therefore, the purpose of this document is to outline the protocols and procedures required to support language access services. This plan serves to inform IDoA staff, vendors, community partners and clients about available language access services and supports, designates key personnel tasked with supporting language access services for the benefit of IDoA consumers, and offers opportunities to further the reach of IDoA language access provisions.

II. Agency Description

The Illinois Department on Aging (IDoA) serves and advocates for over 2.7 million older Illinoisans and their caregivers by administering programs and promoting partnerships that encourage independence, dignity, and quality of life. IDoA strives for efficient and effective access to services that prevents or delays nursing facility placement and maximizes an individual's ability to remain as independent as possible within their community. IDoA promotes its principles of respect for yesterday, support for today, and planning for tomorrow.

Created in 1973 by Public Act 78-242 (or 20 ILCS 105/), the Department administers a comprehensive service delivery system to serve the State's growing population of older adults and their caregivers. Services are provided in coordination with 13 Area Agencies on Aging and their sub-contractors, and

Illinois Department on Aging
Language Access Plan
2022-2024

various direct IDoA contractors that include 38 Case Coordination Units and 150 CCP service provider agencies across all 102 Illinois counties.

The Department serves as the single state agency to receive funds under the Federal Older Americans Act for community supportive services and currently has an annual budget of 1.7 Billion in state and federal funds.

The Department's major programs and services include the following:

- Community Care Program (CCP)
- Adult Protective Services (APS)
- Long Term Care Ombudsman Program (LTCOP)
- Senior Health Insurance Program (SHIP), and
- Older American Act - Includes programs that improve the health and welfare for older adults (nutritional programs, transportation, senior employment, & caregiver support)

III. Federal, State and Local Laws regarding Language Access

IDoA works to provide language assistance services to Aging Illinoisans' and their families consistent with various federal mandates and statewide Acts. These include the following:

- [Title VI of the 1964 Civil Rights Act](#) stipulates that no person in the United States shall on the ground of race, color, or national origin be excluded from participation in, denied benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.
- Revised regulations under Titles II and III of the [Americans with Disabilities Act](#) affect how public entities (state and local governments) and private businesses must provide effective communication with individuals with disabilities. These regulations require public and private entities to provide appropriate auxiliary aids and services where necessary to make sure that individuals with speech, hearing and vision disabilities understand what is said or written and can communicate effectively. Auxiliary aids and services must be provided in accessible formats, in a timely manner, and in a way that protects the privacy and independence of the individual with a disability. A public entity or private business cannot impose a surcharge on an individual with a disability to cover the costs of the auxiliary aid or service provided.
- Consistent with longstanding principles under civil rights laws, as well as the final rule in Section 1557 of the Affordable Care Act of 2010 (ACA), discrimination on the grounds of race, color, national origin, sex, age, or disability in certain health programs and activities is prohibited. [Section 1557, the civil rights provision of the ACA](#), final rule applies to any health program or activity, any part of which receives funding from the Department of Health and Human Services (HHS), such as hospitals that accept Medicare or doctors who receive Medicaid payments; the Health Insurance Marketplaces and issuers that participate in those Marketplaces; and any health program that HHS itself administers. The federal government and those receiving assistance from the federal government must take reasonable steps to ensure that LEP persons have meaningful access to the programs, services, and information those entities provide. All programs and operations of entities that receive assistance from the federal government must comply, including:

Illinois Department on Aging
Language Access Plan
2022-2024

- State agencies
- Local agencies
- Private and nonprofit entities
- Sub-recipients (entities that receive federal funding from one of the recipients listed above)

- [Culturally and Linguistically Appropriate Services Initiative](#), which supports language provisions via the federal Culturally and Linguistically Appropriate Services (CLAS) Standards, created in 2001 by the federal Office of Minority Health.

- IDoA Equal Employment Opportunity/Affirmative Action Policy Statement ensures equal opportunities in employment and equal services to the citizens of Illinois.

IV. IDoA Language Access Services

IDoA currently offers an array of language access services, including:

- **Document and Web Content Translation.** Important program information is available in multiple languages on IDoA’s website as well as through the various Aging -Network providers. These documents include flyers, applications, brochures, and other materials for public use. Some of these materials are posted on the IDoA website. In addition, there is an option on the website that will translate web content into 100 languages.

- **Human Resources.** The Office of Human Resources identifies existing staff that are linguistically, culturally, and technically able to deliver services in a language other than English and/or to serve as interpreters as well as receive bilingual supplemental pay to do so. To better serve LEP individuals accessing public health services throughout Illinois, IDoA continuously evaluates hiring opportunities to identify and redefine positions where the Bilingual Option should be utilized. Recruitment efforts to seek qualified candidates with bilingual skills have increased in recent years. IDoA has identified additional resources from which to select candidates and has increased visibility at job/health fairs and through the advertisement of openings in targeted newspapers and websites. In addition, IDoA has bilingual Spanish-speaking CMS certified interviewers to assist in identifying qualified bilingual candidates and support established recruitment efforts.

- **Public Information and Communications.** IDoA has a designated Communications and Public Information staff who serves as the central point of contact for managing real-time translation and interpretation of press releases, media, and other tools for use during breaking news/public health emergencies.

- **Vital Documents.** IDoA has developed a list of documents required for the public to have access to our various services. This list will be updated regularly to include as changes or additions are made to the existing list. See Appendix I for current list.

Illinois Department on Aging
Language Access Plan
2022-2024

V. Points of Contact

Points of contact include both in-person and via phone. Phone communication can occur when members of the public call any of IDoA's offices, noted below, or the Senior HelpLine. The Department's statewide toll-free Senior HelpLine provides information and links older adults and their caregivers to services. In addition, the Senior HelpLine staff answers the dedicated Adult Protective Services (APS) Hotline during business hours.

Agency Language Access Coordinator:

Glenda M. Corbett, Special Assistant to the Director on Community Engagement and Equity
555 W. Monroe Suite 1500-S
Chicago, IL 60661
773-771-2114
Glenda.Corbett@illinois.gov

VI. Language Assistance Service Protocols

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

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

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

To avoid any misinterpretation, IDoA staff should never ask another IDoA employee or unqualified third parties to determine the language of an LEP person. The exception to this is when the LEP person brings someone they trust with them to act as their interpreter, such as a family member.

Language assistance services include:

- Bilingual Staff
- Interpretation Services
- American Sign Language Interpretation
- Teletype Device (TTY)/Telecommunications Device for the Deaf (TDD)
- Telephone Interpretation
- Written Language Translation

Bilingual Staff

IDoA has staff that are linguistically and culturally competent who can effectively provide direct service to diverse populations. For example, nearly a quarter of the staff within the Division of Community

Illinois Department on Aging
Language Access Plan
2022-2024

Relations and Outreach (DCRO) are bilingual. This includes the staff of the Senior HelpLine, as well as the staff of the Senior Health Insurance Program (SHIP) which provides outreach and counseling to Illinois Medicare beneficiaries. Specifically, there are nine staff members within DCRO who are fluent in Spanish and receive supplemental bilingual pay who can communicate directly with the Spanish-speaking public. If interpretation services are determined to be needed, the first contact staff member shall take the following steps:

Contact a staff member that is proficient in the LEP client's identified language and schedule a time where all parties would be available to discuss matters related to the service or prospective service to be provided by IDVA.

If no staff members are proficient in the client's language or available in the next three (3) business days to provide interpretation, the staff member shall contact the telephonic or internet language interpretation service provider with whom IDoA has contracted for this purpose.

Using Telephone Interpretation Line

Consult the call with Propio Interpreter Service by dialing 1-866-828-3280

When prompted

Enter the 4-digit access code: 3889

Enter 2-digit language code for desired language.

Provide to agent:

Caller's first name, initial of last name, and work number with area code.

Click Conference to merger caller, interpreter, and yourself into one line.

Interpretation

Interpretation is the rendering of one spoken or signed language into that of another language. IDoA provides the following services to support interpretation for IDoA clients and staff:

- American Sign Language Interpretation
- Teletype Device (TTY)/Telecommunication Device for Deaf (TDD)
- Telephone Interpretation

American Sign Language Interpretation

There is a state master contract for procuring interpretation and translation services for all state agencies, including IDoA. The contract is with Multilingual Connections LLC. Per the state master contract, Multilingual Connections provides interpretation services on an "as needed" basis at public meetings/hearings, conferences, workshops, training sessions, other direct person-to-person interactions, etc. Requests for interpretation services should be made at least 4-6 weeks in advance.

Teletype Device (Telecommunication Device for Deaf (TDD))

A TDD is an auxiliary aid and service for individuals with hearing and speech impairments.¹ A TTY is a predecessor to a TDD. The acronym TTY, or Teletype device, referred to the extremely large machines

¹Flyers and other print and digital announcements should be provided in alternative formats such as Braille when

Illinois Department on Aging
Language Access Plan
2022-2024

used to type messages back and forth over the phone lines. A TDD operates in a similar way but is a much smaller desktop machine. Since the deaf community has used the acronym "TTY" for so many years, it is still commonly used interchangeably with "TDD."

A relay system makes it possible for deaf people who use TTYs to call other people. To access the Senior HelpLine, Monday through Friday from 8:30 am to 5:00 pm, an individual with a hearing or speech disability may dial 711 to reach Illinois Relay. The free service allows people who are deaf, hard of hearing, speech-disabled, or deaf-blind to place and receive calls to standard telephone users via a keyboard or assistive device. Illinois Relay provides a communications link between those who use TTY and those who use a standard voice telephone.

Telephonic Interpretation

The goal of IDoA telephonic interpretation measures is to ensure all departmental telephonic communication with the public is accessible to all populations and to comply with federal language access regulations. Interaction with the public over the telephone must be accessible to all residents, regardless of their ability to speak English. IDoA, in adherence with state and federal language access mandates, requires that members of the general public who are LEP have communication access that is equally effective as that provided to people who are proficient in speaking English.

If a member of the public calls IDoA and speaks a language other than English or Spanish, Telephonic Interpreter Services (TIS) are made available for all in-person telephone contact with the public. These services are readily available for calls received by IDoA. The Senior HelpLine uses TIS provided by Propio Language Services through a master contract with the State of Illinois. Propio provides TIS in more than 350 languages. The Senior HelpLine staff are trained on the procedure to contact Propio when TIS is needed to assist a caller with Limited English Proficiency (LEP). The specific procedure includes the following steps:

If telephonic and or video remote interpreters are needed, access to the company *Propio* is available to staff for such services. The following procedures are to be followed to contact Propio. Telephonic Interpreter Services (TIS) are made available for all in-person and telephone contact with the public. If a member of the public visits or calls GAC and does not speak English, Propio Language Services should be contacted for interpretation services by taking the following steps.

Using Telephone Interpretation Line

Consult the call with Propio Interpreter Service by dialing 1-866-828-3280

When prompted

Enter the 4-digit access code: 3889

Enter 2-digit language code for desired language.

Provide to agent:

Caller's first name, initial of last name, and work number with area code.

people who are blind request them. One way to build your capacity to produce documents in formats such as Braille is to develop relationships with community groups that can assist. People with other visual and sensory disabilities may also require alternative formats such as audio, digital, and large print, which can be produced in-house relatively easily and inexpensively when they are needed.

Illinois Department on Aging
Language Access Plan
2022-2024

Click Conference to merger caller, interpreter, and yourself into one line.

Telephonic Interpretation Feedback Mechanism

Questions, concerns, or feedback with regard to the telephonic interpreter session, including the quality of the telephonic interpretation should be made directly to IDoA Office of Finance and Administration Division of Accounting Services.

Translation

Translation is the written or text-based rendering of one language into that of a secondary language. Translation services serve to meet the IDoA mission of serving all the people in the State of Illinois and to promote healthy people, families, communities and environments through education and prevention. IDoA's primary goal through translation is to ensure written materials are accessible to the target audience, including residents who are LEP.

To request a document be translated, the IDoA staff member may send a request, via email, to the Office of Print and Publications. The request should specify the language (or languages) required for translation and may include details such as the purpose of the material and key messages. The Print and Publications team will forward the document to the Procurement Office with appropriation information, word count, and images, if needed. The Procurement Office will submit a request for the translation service to Multilingual Connections, LLC. The turnaround time for translation is based upon the specific languages and the number of documents requested.

The Department also provides funding to Aging Network organizations to support the translation of documents. The Department works with many ethnic service providers for service delivery and some funding may be allowed to support translations to better serve LEP older adults.

If translation services are needed, the staff shall take the following steps:

1. Contact a staff member that is proficient in the LEP client's identified language and request that they translate the document into the identified language. Unless the document to be translated is more than 10 pages in length, the translating staff member shall provide a translated version of the document to the requesting staff member within seven (7) days of the request.
2. If no staff members are proficient in the client's language, are available in the next three (3) business days to initiate translation services, or the document is more than 10 pages in length, the staff member shall contact the translation service provider with whom IDoA has contracted for this purpose.
3. In the event of an emergency, the staff member may utilize a client's family member or unauthorized internet translation software to provide temporary translation services. The staff member should only utilize the family member or unauthorized internet translation software until the emergency has been addressed.
4. The staff member or supervisor should direct any questions in utilizing these steps to IDoA's language access coordinator.

Illinois Department on Aging
Language Access Plan
2022-2024

VII. Notice to Public

The approved LAP is available on the public facing IDoA website.

VIII. Next Steps

IDoA intends to further support, increase or refine the language access plan as indicated through strategic implementation, monitoring and evaluation of each element or component. IDoA intends to have the following components functional within the next two to five years, unless otherwise indicated:

1. Translation: This process is functional and will undergo a biannual review. The LAP Committee will identify documents that are not translated into other languages that would be useful for the LEP community and make them available on the IDoA public-facing website. IDoA will communicate with CMS to investigate adjusting the scope of services of all contracts with translation and interpretation services, to include a provision of surge capacity for linguistic services as requested by IDoA.
2. Human Resources: IDoA will continue to evaluate hiring opportunities to identify and redefine positions where the Bilingual Option should be utilized. Recruitment efforts to seek qualified candidates with bilingual skills will continue and be enhanced. IDoA plans to increase the number of bilingual CMS Certified Interviewers to augment efforts in identifying and recruiting qualified bilingual candidates.
3. Interpretation: This process is functional and will undergo a biannual review. IDoA will communicate with CMS to investigate adjusting the scope of services of all contracts with translation and interpretation services, to include a provision of surge capacity for linguistic services as requested by IDoA.
4. Staff Training: Training is a critical operational piece to ensuring language access services are supported. Training will be administered to staff and Aging Network providers annually to ensure an understanding of addressing the needs of LEP individuals and to increase workforce familiarity with available translation and interpretation resources. The training provided will focus on the following topics:
 - A. Gaining increased knowledge on the definition of Limited English Proficiency and Language Assistance Services.
 - B. Understanding IDoA's need for a Language Access Plan (LAP).
 - C. Learning how to effectively and respectfully communicate and interact with individuals with Limited English Proficiency (LEP).
 - D. Learning the procedures to request and work with an interpreter, including when to use an interpreter.
 - E. Gaining knowledge on how monitoring feedback on your LAP will garner continuous improvement.
 - F. Gaining knowledge on how/where to access translated documents.

Illinois Department on Aging
Language Access Plan
2022-2024

5. Outreach: Increasing outreach and educational efforts aimed at educating LEP population about IDoA Programs and Services.
 - a. IDoA will share our News bulletins, Language Access Plan and PowerPoint Training Tool with our Community Providers and Stakeholders.
 - b. IDoA will promote the availability of LEP services on our public facing website and at outreach events.
 - c. IDoA will utilize social media to share LEP services including but not limited to Facebook, Twitter, Linked-In, and Instagram to share how to access our services in multiple languages.
 - d. IDoA will create marketing tools translated into various languages and disseminate them to targeted communities.

6. Agency Monitoring: One of the primary elements of an effective and appropriate language access plan is monitoring of the plan. Monitoring to ensure compliance with Federal and State Language Access Laws will occur biannually. In addition, IDoA will:
 - a. Assess the LEP demographics of the relevant service areas serviced by the 13 Area Agencies on Aging;
 - b. Review the language needs of consumers and others who access language access services;
 - c. Assess staff knowledge and implementation capacity with regard to language access policies and procedures; and.
 - d. Assess continued viability of language access provisions currently in place.

7. Engagement of Stakeholders: to be continually engaged and participate in regular, periodic, or episodic review of the LAP as needed.

8. Review and Revision of Plan for Appropriateness and Applicability: To occur biannually.

9. Vendors: As a mechanism for ensuring the provision of accessible and meaningful language services, IDoA grantees must ensure services they are contracted by IDoA to provide are both culturally and linguistically appropriate. Grantees shall also ensure that any services provided by sub-grantees are similarly culturally and linguistically appropriate.

This LAP represents the IDoA administrative blueprint to provide meaningful access to Agency services, programs and activities by LEP individuals.

Illinois Department on Aging
Language Access Plan
2022-2024

IX. IDoA Language Access Complaint Procedure

If an individual believes he/she has been denied the benefits of this Language Access Plan a complaint may be filed with the IDoA Equal Employment Officer. A written complaint must be filed within 6 months of the alleged denial and sent to the following:

Illinois Department on Aging
EEO/AA Officer & ADA Coordinator
Office of the Director
One Natural Resources Way, #100
Springfield, IL 62702-1271
Email address: robin.a.tucker@illinois.gov

If the complainant is not satisfied with the findings or corrective action taken, an appeal may be filed with:

Secretary, U.S. Department of Health and Human Services
Office for Civil Rights
200 Independence Ave., SW
Hubert H. Humphrey Building
Washington, DC 20201

Mary Killough
Acting Director
Illinois Department on Aging

Date

Illinois Department on Aging
Language Access Plan
2022-2024

X. Appendices

Appendix I: Vital Documents

Division of Community Relations & Outreach:

- SHIP (Senior Health Insurance Program)
- Senior Helpline
- Marketing
- Benefits Access Program

Division of Home and Community Services:

- Bureau of Community Operations
- Choices in Care in Illinois
- Community Care Program
- Family Caregiver Support Flyer- Spanish
- IL Relatives Raising Grandchildren – Spanish
- Senior Flyer – Chinese
- Senior Flyer – French
- Senior Flyer – Hindi
- Senior Flyer – Polish
- Senior Flyer – Russia
- Senior Flyer - Urdu

Division of Planning, Research, & Development:

- Office of Training and Development
- Applying for Services
- Your Responsibilities
- Your Right to Appeal
- Notice of Privacy Practices
- Your Need to Know about Adult Protective Services
- Home Care Participant and Bill of Rights

Division of Advocacy and Preventive Services:

- Program Verification Determination
- Office of Adult Protective Services

Office of State Long Term Care Ombudsman:

- Long-Term Care Ombudsman Program
- You Have Rights – English
- You Have Rights – German
- You Have Rights – Hindi
- You Have Rights – Korean

Illinois Department on Aging
Language Access Plan
2022-2024

You Have Rights – Mandarin
You Have Rights – Polish
You Have Rights – Russian
You Have Rights – Spanish
You Have Rights – Traditional Chinese
Residential Rights Long Term Care
Residential Rights – English
Residential Rights – German
Residential Rights – Hindi
Residential Rights – Korean
Residential Rights – Mandarin
Residential Rights – Polish
Residential Rights – Russian
Residential Rights – Spanish
Residential Rights – Traditional Chinese
Home Care Ombudsman Program
Translation Services