



# Language Access Plan

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## **I. Overview of IDES**

The Illinois Unemployment Insurance Act and the Federal Wagner-Peyser Act authorize the administration of the Unemployment Insurance, Employment Service and Labor Market Information programs. Through its administration of these programs, the Illinois Department of Employment Security (IDES) plays a central role in improving Illinois' economic environment and the prosperity of its people. IDES is a cabinet-level State government agency under the leadership of a Director, who is responsible for both general policy and day-to-day agency management.

### **Unemployment Insurance (UI)**

IDES administers the State's Unemployment Insurance program to ensure that individuals receive unemployment benefits which they are eligible for. This employer-funded program provides temporary income replacement for individuals who are out of work through no fault of their own. It is a state-operated (administration is federally funded) insurance program designed to partially replace lost wages when persons are temporarily or permanently out of work or if they work less than full time due to a lack of work. The Unemployment Insurance program is administered to alleviate the negative effects of economic downturns on businesses and the unemployed. The agency works to prevent and detect fraud, provide timely payments to claimants, and ensure equitable access.

### **Employment Services (ES)**

In accordance with the Wagner-Peyser Act, IDES provides employment services to all Illinoisans through basic career services, easily accessible technology and coordinated efforts with workforce partners within a statewide network of American Job Centers (AJC). The agency is committed to connecting Illinois' workforce to the education, training and jobs required to strengthen the economy in Illinois. The employment service program improves the prospects of qualified jobseekers by connecting them with an employment, educational or training opportunity through both Illinois Job Link and referrals to partner programs in the AJCs. Also required by Wagner-Peyser, IDES employs staff to reach out to Migrant and Seasonal Farm Workers (MSFW) to ensure that they have access to all the services provided by IDES. The outreach staff locates, contacts, and informs MSFWs about workers' rights, job openings, IJL, and potential referrals for workforce partner services.

### **Business Services (BS)**

IDES' Business Services Outreach (BSO) team is primarily responsible for conducting business outreach and engagement activity. BSO works with partners in local AJCs to provide employers with better, faster, and more accurate information on services to help them meet their hiring needs. BSO staff reaches out to and educates the employer community, industry associations, chambers of commerce, economic groups, community-based organizations, and other employing entities about available IDES services such as job fairs, marketing, and outreach efforts.

### **Legal Services**

Legal Services oversees the areas of the agency which are responsible for a variety of legal services. The Office of Legal Counsel's legal and administrative staff directly participate in programs that IDES administers by advising the various departments and coordinating quarterly meetings of the Employment Security Advisory Board. The attorneys in the Office of Legal Counsel also assist the Chief Legal Counsel with overseeing the IDES Board of Review Division, Appeals Division, and the Division of Legislative Affairs. The Appeals Division conducts administrative hearings and issues decisions when claimants and/or employers dispute unemployment claims or employer liability and are dissatisfied with the Department's decisions regarding eligibility for Unemployment Insurance (UI) benefits or the amounts of employer contributions to the Unemployment Insurance Trust Fund.

### **Revenue Division**

The Revenue Division's mission and purpose is to administer a quality Unemployment Insurance (UI) contribution system that meets and/or exceeds the UI standards provided by the U.S. Department of Labor (USDOL) Employment and Training Administration (ETA). The Revenue Division is divided into five subdivisions, including Employer Reporting, Employer Services, Billing & Collections, Employer Audit, and GenTax, to address the needs of the approximately 340,000 employers in Illinois.

### **Economic Information and Analysis (EI&A)**

Under Illinois' Workforce Innovation and Opportunity Act Implementation Plan, IDES is designated as the State's primary provider of employment statistics. Accordingly, IDES' Economic Information and Analysis Division (EI&A) develops and maintains the most comprehensive labor market and career information programs in the State. The Division's statistical databases contain data it collects from IDES' own UI and ES systems, four statistical programs it administers for the USDOL, and various secondary sources such as the decennial census. EI&A analyzes and publishes this information for use by employers, job seekers, career counselors, government agencies, educators, and economic developers.

## **II. IDES Language Access Mission Statement**

The Illinois Department of Employment Security focuses on assisting those unemployed at no fault of their own with access to unemployment compensation and employment services, connecting with employers seeking to expand their workforce, and sharing data with policymakers looking to make informed, fact-based decisions that impact Illinois' economy.

IDES is an equal opportunity employer and complies with all Federal and State Civil Rights and nondiscrimination laws, rules, and regulations. Further, IDES receives federal funding from USDOL and is subject to its Nondiscrimination Regulations seen under 29 CFR 38. These Nondiscrimination Regulations include, but are not limited to, compliance with all Federal and State Nondiscrimination laws pertaining to National Origin. Additionally, USDOL has various nondiscrimination regulations which pertain to language access. IDES is required to provide language access to all those who seek our services, benefits, and use of our programs in an equal and meaningful way.

Specifically, clients with Limited English Proficiency (LEP) must be provided meaningful access to IDES programs and services. An LEP client is a person whose primary language is a language other than English and who requires interpretation and/or translation services to fully engage in IDES services, benefits, and programs.

Under no circumstances shall services to an LEP client be denied or unnecessarily delayed due to the client's LEP.

### **III. Language Access Plan Legal Basis and Purpose**

#### **Purpose and Goals**

This Language Access Plan aims to provide guidance to IDES 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 to continue IDES' compliance with Illinois' Language Equity and Access Act (15 ILCS 56), the Illinois Civil Rights Act of 2003 (740 ILCS 23), Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) 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). IDES is also bound through federal financial assistance United States Department of Labor's Nondiscrimination Regulations outlined in 29 CFR 38, in addition to the Section 188 of the Workforce Innovative Opportunity Act or WIOA. Illinois and IDES are 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 (15 ILCS 56) and all other state and federal nondiscrimination regulations effecting the Limited English Proficient population.

#### ***Title VI of the Civil Rights Act of 1964***

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, IDES is bound by Title VI 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).

#### **Workforce Innovation and Opportunity Act (WIOA)**

The Federal WIOA prohibits discrimination in IDES programs and activities that receive federal financial assistance. Under 29 CFR 38.9 (a) (b) of WIOA, IDES ensures the LEP individuals are not discriminated against based on National Origin by offering meaningful access to aids, benefits, and training to all IDES services.

### ***Illinois Civil Rights Act of 2003***

The [Illinois Civil Rights Act](#) (740 ILCS 23) 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](#) (775 ILCS 5) (IHRA) 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.<sup>1</sup>

### ***Language Equity and Access Act***

Signed into law by Governor Pritzker in 2024, the Language Equity and Access Act 2024 (15 ILCS 56) 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.<sup>2</sup> 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, the IHRA, and the Illinois Civil Rights Act of 2003.<sup>3</sup>

The Act designates the Governor's Office of New Americans (ONA) as the lead agency responsible for coordinating the implementation of statewide language access policy, with the support of the Department of Human Services. ONA is tasked with providing oversight, offering technical assistance, and ensuring agency compliance with the Act's requirements.

Under the Act, 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.

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

<sup>2</sup> 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>.

<sup>3</sup> See *Language Equity and Access Act*, Pub. Act 103-0723.

## **Guiding Principles**

In accordance with federal and state requirements, including the Illinois Language Equity and Access Act (15 ILCS 56), this Language Access Plan provides a framework for ensuring IDES can deliver timely and meaningful language assistance services to IDES' constituents with LEP. IDES is committed to providing equitable language access to its services, programs, and activities for all individuals, regardless of the language they use. IDES has and will continue to 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 IDES' 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 agency will also work to expand multilingual website content, including program information, complaint procedures, and eligibility criteria.
- Establishing mechanisms to track progress across divisions, programs, and funded partners, and 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. IDES has and will continue to 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. IDES has and will continue to 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 IDES' 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.
- **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.”<sup>4</sup> Language intended for public consumption avoids non-essential information and complex

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

- 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.

#### **IV. Overview of IDES Language Access Plan and Services**

IDES provides a variety of multilingual services to ensure the LEP community have equal and meaningful access to our services, programs, and benefits. This Section will give a general overview of those services with greater detail being provided further along in the report. IDES, on an annual basis, assesses its bilingual needs to best serve its multilingual and LEP populations.

##### **Process Used to Assess LEP Needs:**

IDES uses a variety of processes to ensure that it meets the Limited English Proficient community's needs. IDES strives to provide equal and meaningful access to all our services, benefits, and programs.

The processes that IDES employs to provide equal and meaningful services to the LEP community are:

- Monitoring of the Local Offices on an annual basis;
- Contracting multilingual interpretation services with a variety of vendors;
- Creating and implementing an LEP action plan and/or a Language Access Plan;
- Review and monitoring of all hires and promotions to ensure adequate bilingual employee representation in our workforce;
- Analysis of underutilization of certain protected minority groups in our workforce;
- Analysis of the labor market data for geographical areas in which IDES provides its services and making appropriate bilingual recommendations to hiring managers to ensure sufficient on-site bilingual staff are present to service the LEP community;
- Completion and analysis of data for the Asian American, African American, Hispanic and Native American Employment Advisory Council surveys completed annually; and
- Being an active member of the Governor's Office of New Americans (GONA) working collaboratively to ensure equal and meaningful bilingual services are available;
- Bi-monthly reviews of Human Resources workforce data and transactions and partnering with various advocate and community groups to ensure appropriately addressing the needs of this community.

## **Results of the Assessment**

As a result of IDES' assessment, there are various multilingual projects IDES has completed and that are still being worked on. These projects are incorporated into this Plan and are operationally implemented via IDES' Executive Staff and the Equal Opportunity Office. Additionally, there has been a determination based on IDES' assessment regarding which languages represent a "significant" portion of the LEP population in Illinois. Some of these languages are, but not limited to, Spanish, Polish, Chinese, Arabic, Hindi, and Tagalog.

As a result of IDES' LEP assessment, IDES has sought to increase additional headcount for bilingual employees, engaged vendors for bilingual services both via the telephone and web, and conducted targeted recruitment with other sister agencies to ensure IDES' workforce represents the communities IDES serves. IDES has also created advisory councils and/or roundtables with community partners, stakeholders, and claimant representatives to discuss language access and provide a mechanism for the bilingual and LEP communities to provide feedback surrounding language access.

## **Timeline for Implementing LEP Plan**

IDES' LEP Plan is dynamic, evolving framework with flexible timelines to accommodate the needs of the LEP community. Some of the LEP Plan objectives and goals are already completed, some are in the middle of being completed, and some objectives are just beginning. IDES recognizes that the LEP Plan must continually adjust to meet the needs of the LEP community that they are serving and therefore our timelines are flexible. IDES believes a fluid Plan which is reviewed and revised on a continual basis is the most effective way to serve the LEP community. A plan devised today will not always be the most effective way to reach a community in the future. Since IDES believes that providing equal and meaningful access is a continuous process and must change depending on the community's needs, IDES is committed to completing a periodic and/or annual review of the Plan to ensure that it is still the most effective way of providing services to the LEP community. IDES also commits to working collaboratively with the GONA to ensure access to all Illinoisans.

## **Language Services Provided to LEP Individuals**

IDES will or is in the process of providing the following language services to LEP individuals:

### **Language Translations Widget on website**

IDES has a language translation widget on its public facing website. This widget allows all our webpages to be translated into multiple languages, including but not limited to the 6 most common Illinois languages at an instant. Additionally, IDES has performed a human review for accuracy of the multilingual widget to ensure the integrity of the translation.

### **Multilingual Translation for Telephones**

IDES is working with a vendor to provide multilingual access for all telephone services. This service allows an individual to navigate through IDES' queue so that they arrive at an agent that can provide the most effective and efficient service, including assisting the LEP caller in their preferred language, either through a bilingual employee or a bilingual interpreter on the phone.

### Multilingual Translation for Documents

IDES is working with a vendor to provide multilingual access for all translation services needed for letters, documents and/or all other paper communication sources. This service allows IDES to translate documents or other communication sources into the claimant/customer's preferred language.

### Multilingual Translation for Webpage

IDES provides multilingual services for its public-facing webpages, including but not limited to, Illinois' six most common languages and help an individual navigate through IDES' website. IDES has created a process where our webpage leads an individual to a live agent that can provide the most effective and efficient service, including assisting the LEP caller in their preferred language, either through a bilingual employee or a bilingual interpreter on the phone.

### Telephonic Language Line Services

IDES contracts with various vendors to provide language translation services via the telephone. The language line vendor assists IDES in answering calls in hundreds of languages. Additionally, they provide IDES with vital data regarding language needs by geographical location. These services assist IDES in meeting USDOL LEP requirements and determining where additional bilingual staff may be needed.

### Bilingual Employees

IDES employs certified bilingual employees within its workforce to assist the LEP community in receiving its services and benefits. The languages that the bilingual employees speak are Spanish, Polish, and Chinese. All other translation services are conducted via interpreters with our language line services. As of Fiscal year 2025, IDES employs 139 bilingual employees. There are 132 Spanish speaking bilingual employees, 6 Polish speaking bilingual employees and 1 Chinese or Mandarin speaking employee.

Bilingual employees hold the following titles at IDES:

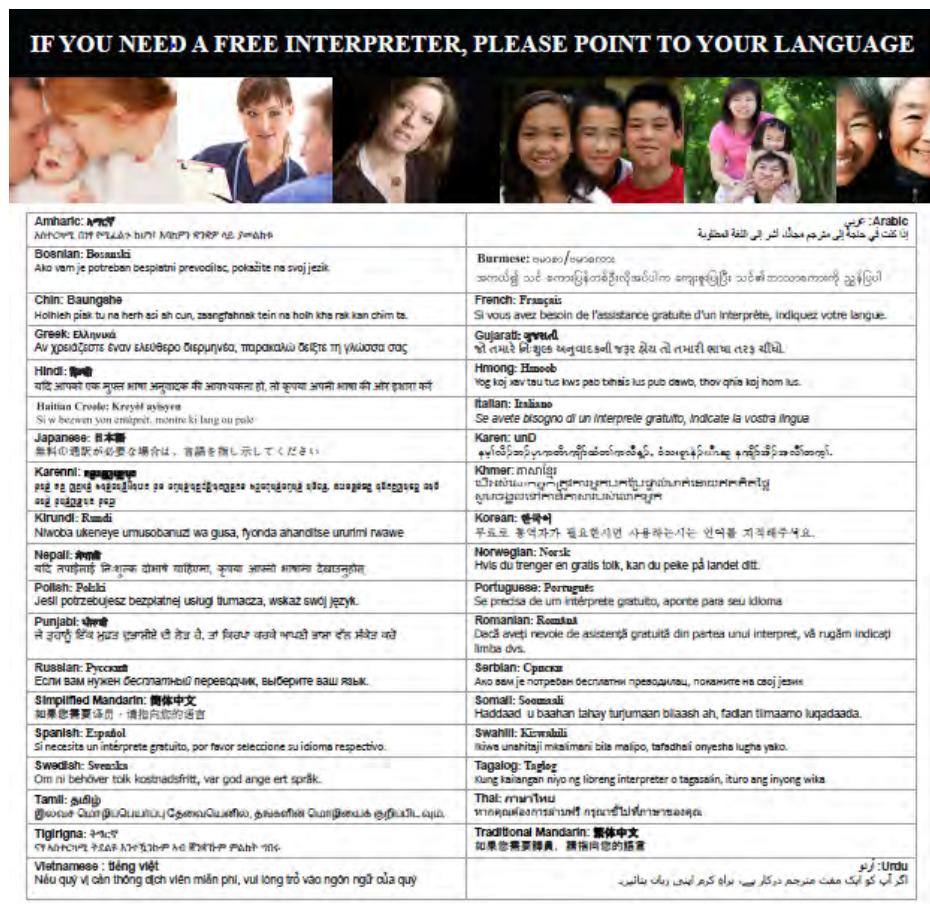
- Public Service Administrator
- Field Office Supervisors
- Employment Security Program Representatives
- Employment Security Service Representatives
- Employment Security Specialists
- Employment Security Tax Auditor
- Executive I
- Hearings Referee
- Office Administrator
- Office Associate
- Unemployment Insurance Adjudicator
- Unemployment Insurance Revenue Analyst
- Unemployment Insurance Special Agents

## Advisory Councils

IDES has a representative on several Illinois Employment Plan Advisory Councils. The Councils in which IDES has a representative are the Hispanic, Asian American, African American and the Native American Employment Advisory Councils. Each Council is comprised of advocates that represent the specific group's interests and needs with a focus on State services and employment. These Councils offer advice and recommendations for how IDES as well as other State agencies may effectively reach and service in a meaningful way the LEP communities that they represent.

## **Notification of LEP Services**

IDES notifies LEP individuals of its LEP services via signs and posters hanging in all its local offices. IDES also notifies the public of its LEP services via social media postings in various languages on the Internet, advertisements and partnerships with advocate and stakeholder partners. IDES sends communication letters to claimants and anyone seeking IDES services or benefits, including “Babel Notices.” Lastly, IDES notifies the community of LEP services by in-person notification and on IDES’ public-facing website.



## Requesting LEP Services

LEP individuals seeking to use IDES' LEP services should notify an IDES employee upon speaking with them of their preferred language. If using the internet to file a claim the individual should indicate, they are LEP and check their preferred language. Upon entering an IDES Local

Office, the individual should point to a language sign and indicate their preferred language. (See Exhibit 5, Language Poster). When calling into the call center or other locations within IDES via the telephone, the individual should indicate that they are LEP and their preferred language so that language line services can be initiated. (See Exhibit 4, Telephonic Interpreting Services Instruction Sheet). Specifics of how and/or when to request LEP services will be detailed more throughout the Plan.

### **Provision of LEP services**

The manner in which IDES staff will provide LEP services are, included but not limited to, the following: web-based services over the internet which translate web pages into multiple languages; through multilingual vendors which provide telephone translation services to LEP claimants; the translation of documents and communication letters into the claimant's preferred language; and the use of bilingual employees. Additionally, IDES will provide translation services upon request in any other reasonable means identified by the LEP individual.

### **Implementation of the LEP Plan**

The steps that must be taken to implement the LEP Plan vary from identifying and working with outside vendors to creating and implementing technology-related translations, i.e., LEP translation for both telephony and web. Additional steps which must be taken to implement the LEP Plan include translation services via communications sent to claimants in their preferred language, the revision of IDES policies and procedures with respect to the technology updates and keeping social media posts updated in the various bilingual languages. Lastly, IDES will ensure posters and signs hanging in local offices are current. Moreover, IDES has created a PLATE Webpage, or "Plain Language, Accessibility, and Translation Equity" page. This page serves as an internal resource or guide for employees regarding meeting the translation needs of anyone contacting IDES whether through the telephone, in-person at our Local Office or via the internet from our webpage.

### **LEP Staff Training**

IDES staff will be trained in various ways to ensure it complies with the Nondiscrimination LEP provisions of the USDOL regulations. New staff will undergo a New Employee Orientation (NEO) training which introduces every staff member to the agency's policies and procedures, including its LEP policy seen in Section 1206. Staff will receive one-on-one training from the EO Office on an as needed basis or as requested by the Division's management or Executive Staff. EO will also provide division training to the various areas which serve the public to ensure their knowledge and understanding regarding the LEP regulations. Managers and Executive Staff members will also be trained during Executive Staff meetings or trainings regarding the LEP provisions and requirements under the Nondiscrimination regulations. IDES will train staff on its computer-based program, called OneNet, to implement and inform all staff of the LEP requirements. Lastly, IDES will e-blast messages and reminders regarding its duties to comply with all Nondiscrimination regulations including LEP.

### **Ensuring Quality Control**

IDES' EO Office continually monitors and ensures compliance with USDOL's Nondiscrimination regulations. The EO Office has three units which work year-round to ensure compliance with regulations including the LEP provisions. The units which work to ensure compliance with the

USDOL Nondiscrimination regulations are the Compliance Reporting Unit, Investigations Unit, and the Monitoring Unit.

### **Documentation of Language Assistance Services**

There are various ways in which IDES documents the provision of language access services. First there are computer software programs that IDES uses to implement and assist in issuing UI services to claimants. IBIS is the software that IDES uses to track all UI services. IBIS tracks LEP claims filed and claimant's preferred languages. This data is used to determine whether IDES is meeting its language needs. IDES also documents the provision of language assistance services via the tracking of its web pages. IDES gathers and monitors data regarding the number of visits on each public facing webpage, including its multilingual pages. IDES uses this data to analyze whether it is meeting its requirements under the USDOL LEP provisions. Economic Information and Analysis or EI&A is a division within IDES that tracks labor market data on a quarterly basis. EI&A's data analysis also assists in ensuring that IDES can forecast trends and see where its services are needed. Lastly, the EO Compliance Reporting Unit conducts an analysis and completes various reports which review the agency's LEP services and needs. This data is used on a continual basis to ensure IDES is staffed appropriately according to geographic location.

### **Schedule for Revising the LEP Plan**

IDES' plan for revising the LEP Plan is that it will be reviewed periodically or upon request and/or direction of IDES Director and as needed and/or directed by the Governor's Office.

### **Oversight of the Language Access Plan**

IDES individuals responsible for overseeing the implementation of IDES' LEP Plan are IDES' Executive Staff team. This includes but is not limited to IDES' Director, Chief of Staff, General Counsel, Chief Financial Officer, Deputy Director of Service Delivery, Deputy Director of Business Services, Veterans Division personnel, Chief Information Officer, Chief Communications Officer, Human Resources, Ethics Officer, and the Equal Opportunity Office staff. Additionally, IDES will work collaboratively with GONA to ensure it is providing equal and meaningful language access to all Illinoisans, including implementing recommendations made by GONA to its Plan.

### **Allocation of Resources to Implement the Language Access Plan**

Allocation of resources to implement the LEP Plan will be with use of Federal USDOL funds via WIOA and/or other federal and/or state funding sources.

## **V. Appointment of a Language Access Coordinator**

On April 20, 2021, IDES appointed Anna L. D'Ascenzo, as its Language Access Coordinator (LAC). Anna L. D'Ascenzo is IDES' Equal Opportunity Officer and an attorney. She has served in this capacity for the last ten years with IDES and for five years prior with the Illinois Department of Human Services. Prior to working for the State of Illinois Anna L. D'Ascenzo was an attorney for the City of Chicago Law Department. Anna can be reached at the following:

Anna L. D'Ascenzo  
Illinois Department of Employment Security  
115 S. LaSalle Street, 17<sup>th</sup> Floor  
Chicago, Illinois 60603  
Office: 312.793.9290

The LAC, Equal Opportunity Office team, the Illinois Department of Innovation and Technology, and relevant IDES Executive Staff Members, will be responsible for devising and ensuring that the agency adheres to its language access directives, plan, policy, and procedures to provide meaningful access to LEP persons. The LAC will further monitor IDES' approach to provide services to LEP individuals, monitor the Language Access Plan's (LAP) performance, oversee the process for reviewing and revising the Language Access Plan and update the Language Access Plan and content every fiscal year and/or as soon as thereafter as practicable.

Per Federal guidance the LAC and/or the LAP should include, but not be limited to the following:

- Be or report to a high-ranking official within the agency since high level support is essential to successful implementation. The coordinator is responsible for language assistance services and may delegate duties but should retain responsibility for oversight, performance, and implementation of the language access plan.
- The language access coordinator may also assist and/or oversee personnel and performance of employee and non-employee interpreters and translators, including:
  - Identifying qualified interpreters and translators to be included in an interpreter database.
  - Creating interpreter, translator, and bilingual staff qualifications and ethical standards.
  - Outlining measures to ensure quality control of interpreters and translators.
  - Training and testing bilingual individuals including staff who provide language assistance services.
  - Assigning qualified interpreters, translators, and bilingual employees to perform language assistance functions.
  - Maintaining a regularly updated list of all competent bilingual employees, contract interpreters, and contract translators that include their availability, non-English language(s) spoken, and contact information.
  - Changing hiring and personnel practices to increase staff language capacity (e.g., providing pay incentives for bilingual employees).
  - Assisting in developing a procurement strategy for contract language assistance services providers.
  - Assisting in the search for funding and other resources to support interpretation and translation; technological and other infrastructural support, and staffing.
  - Providing input in budgetary and procurement matters related to implementation of the language access policy, plan, and procedures; and

- Coordinating procurement for interpreter and translator compensation for services rendered.

## **VI. Language Access Plan Submission**

IDES' LAP was submitted to the Governor's Office and was internally distributed to IDES' Executive Team members in May of 2021, and thereafter, in 2022, 2023 and now in 2025, and as needed and/or requested, as substantive revisions are made. IDES will also work with GONA to ensure continued equal and meaningful language access to its services, benefits, and programs.

## **VII. Language Access Plan Publication**

IDES will make public its LAP by posting information about the Plan on its public facing webpage. IDES will also make its LAP available to all IDES employees by posting information regarding the Plan on its intranet. IDES will also file a copy of its Plan to GONA on an annual basis and/or upon request.

## **VIII. Language Access Plan**

### **A. Policy Directives**

IDES strives to provide equal and meaningful access to all, including language access, as it administers its benefits, services, and programs. IDES complies with all Federal and State Equal Opportunity or nondiscrimination laws, rules, and regulations. These include those outlined in IDES EO Policies and Procedures seen in 1200 through 1207. (See Exhibit 1, IDES EO Policies and Procedures).

IDES Policy and Procedure, 1206, "*Serving Clients with Limited English Proficiency*," Section 1206.10 states:

Clients with Limited English Proficiency (LEP) must be provided meaningful access to IDES programs and services. An LEP client is a person whose primary language is a language other than English and who requires interpretation and/or translation services to meaningfully and effectively participate in IDES services, benefits, and programs.

Under no circumstances shall services to an LEP client be denied or unnecessarily delayed because of the client's Limited English Proficiency. Where possible, an LEP client should be served by a language option employee who speaks the client's language. When no on-site interpreter is available, the telephone-accessed language interpreter service vendor under contract with CMS and/or IDES should be used. (See subsection .204 for instructions on how to access and use the interpreter service.) Any refusal of IDES interpreter services by an LEP client should be noted in his or her

file and reported, as soon as practicable, to the Equal Employment Officer.

(See Exhibit 2, IDES Policy and Procedure 1206, *Serving Clients with Limited English Proficiency*).

Additionally, IDES Policy and Procedure 1206 further details how IDES will ensure equal and meaningful access to its language services via posting notices, identifying LEP clients, and how employees should go about selecting interpretation services. Relevant portions of the policy state:

#### **.201 Posting Notices**

Notices in Spanish and, where possible, any other language commonly used by LEP clients of a local office announcing the availability of free interpretation services should be conspicuously posted at the entrance to the local office. A language identification sign instructing an LEP client to point to his or her language should be conspicuously posted in the intake area.

#### **.202 Identifying LEP Clients**

Where possible, language option employees (i.e., bilingual employees) should serve as intake staff or as resource persons (See Section 5001 of this Manual). The intake staff person identifies LEP clients and determines the language in which the LEP client needs service. If that language is not readily apparent, it should be determined through use of either the language identification sign or language identification flash cards. If the language cannot be determined through use of the sign or flash cards, it should be determined through use of the language interpreter service.

#### **.203 Selecting an Interpreter Service**

IDES is responsible for providing official interpreters as needed by the Department's clients. IDES language option staff or interpreter services must be used as the primary means to interpret for the client. However, an LEP client may provide an interpreter of his or her choosing at his or her expense but only as a supplement and not in lieu of the interpreter services provided by IDES. Interpreter services are always available for use by the local office representative. The local office representative must not rely only on an interpreter provided by the LEP client. IDES reserves the right to require that client-supplied interpreters are certified or are otherwise qualified to provide interpreter services.

Additionally, IDES complies with USDOL Nondiscrimination Regulations, 29 CFR 38, under the WIOA. As part of its duties and responsibilities, IDES submits bi-annually to

USDOL, a Nondiscrimination Plan. The last USDOL Nondiscrimination Plan submission was in February 2025.

The USDOL Nondiscrimination Plan gives assurances that IDES will comply with its Nondiscrimination Regulations as set forth in 29 CFR 38, including but not limited to, National Origin discrimination protections and language access regulations. Within the Nondiscrimination Plan IDES files with USDOL, there is a Limited English Proficient or LEP Plan guidance. 29 CFR 38, Section 38.9, gives specific guidance as to what IDES' LEP Plan should encompass. In February of 2025 IDES along with Department of Commerce and Economic Opportunity, or DCEO, submitted on behalf of Governor Pritzker to USDOL its most updated bi-annual Nondiscrimination Plan. This 2025 Plan included LEP provisions for how the agency would ensure language access to its LEP community.

## **B. Language Access Plan Structure and Organization**

### **Identification of Persons Charged with Implementing the Plan**

The person(s) responsible for implementing the Language Access Plan are the Language Access Coordinator, Equal Opportunity Office, Illinois Department of Innovation and Technology partners and relevant IDES Executive Staff members.

### **Identification and Assessment of LEP Communities**

The EO Monitors assist in planning and coordinating the monitoring of local office activities to ensure compliance with federal mandates including the assessment of LEP communities. Principal duties for assessing appropriate language access for LEP communities within Illinois include various means of measurement and analysis. Some include, performance of statewide on-site visits, and development of statistical computer-based reports involving the applications of complex mathematical and statistical methodologies. In addition, EO Monitors utilize mainframe systems and computer software programming language application, data collection, analysis and report writing. The EO Monitors assist in the implementation, maintenance, evaluation, and monitoring of procedures to ensure local offices are in full compliance with federal nondiscrimination requirements found in 29 CFR 38, namely LEP language access. This review provides a statistical analysis of the data collected and includes an analysis by race/ethnicity, sex, age, disability status, Limited English Proficiency, and preferred language. IDES further assesses IDES' language access needs when researching and answering various CMS surveys regarding its bilingual employees and bilingual needs.

### **Timeframe, Objectives, and Benchmarks**

Compliance with USDOL Regulations requires IDES to continually work towards full compliance with language access requirements ensuring the LEP community has equal and meaningful access to all IDES services, benefits, and programs. Statutory and regulatory requirements under both Federal and State Nondiscrimination laws have several reporting measures to ensure language access work is undertaken. Every other year IDES is required to file a Nondiscrimination Plan with USDOL making assurances that they are in compliance with their nondiscrimination regulations. Additionally, IDES files an annual

Affirmative Action Plan with the Illinois Department of Human Rights, State Services Assurances Act Report with the General Assembly, Quarterly Reports with the Illinois Department of Human Rights and a Bilingual Pay and Bilingual Needs Survey Report with Central Management Services. Furthermore, IDES submits annually surveys to the Hispanic Employment Plan Advisory Council and the Asian American Employment Plan Advisory Council which both include language analyses. These reports all have metrics which IDES uses to measure benchmarks and compliance with language access for the LEP community it serves.

Additionally, the Illinois Human Rights Act and/or the USDOL Nondiscrimination Regulations require IDES to monitor its agency Local Offices on an annual basis. This monitoring takes an in-depth look at the surrounding labor market availability of the Local Office area, LEP unemployment insurance claims filed, calls for language translation services and other factual data to determine sufficient levels of bilingual employees. Based on the EO Office's assessment of this data, EO Office will make a recommendation to the hiring manager regarding the increase of bilingual positions indicating specifically what language it recommended to best meet the needs of the LEP community.

### **Funding and Procurement Issues**

IDES is Federally funded by USDOL and therefore required to comply with all Federal and State nondiscrimination laws, rules, and regulations, including language access for the LEP community regardless of special funding and/or Procurement issues. Additionally, Procurement of services regarding language access are handled mostly with master contracts through CMS which streamlines the process. Should a language access service be needed that is not covered through a master contract with CMS, IDES' EO Office will work with the Executive Team within IDES, including its Chief Procurement Officer, to requisition such services or goods as needed.

### **Notice of Language Assistance Services**

IDES notifies the public, including its LEP community, of its language assistance services by various methods of advertisement, partnership, and outreach to LEP communities and/or advocates. Notice of Language Assistance Services can be found on IDES' public and private webpages. Additionally, there are various posters located in the Local Offices for the public to see and point to. Moreover, translation services are readily available via telephonic interpretation when an LEP individual contacts IDES. Lastly, IDES, to assist with notice of translation services internally with front-line staff, created a brochure to serve as a quick reference or resource.

Additionally, as required by Federal and State laws, rules and regulations, IDES is required to undertake "affirmative outreach" measures. According to 29 CFR 38, Section 38.40, it states:

#### **§ 38.40 Affirmative outreach.**

Recipients must take appropriate steps to ensure that they are providing equal access to their WIOA Title I- financially assisted programs and activities. These steps should involve

reasonable efforts to include members of the various groups protected by these regulations including but not limited to persons of different sexes, various racial and ethnic/national origin groups, various religions, individuals with limited English proficiency, individuals with disabilities, and individuals in different age groups. Such efforts may include, but are not limited to:

- (a) Advertising the recipient's programs and/or activities in media, such as newspapers or radio programs, that specifically target various populations;
- (b) Sending notices about openings in the recipient's programs and/or activities to schools or community service groups that serve various populations; and
- (c) Consulting with appropriate community service groups about ways in which the recipient may improve its outreach and service to various populations.

## **C. Language Access Plan Communication, Outreach and Training**

### **Language Publications/Posters**

Additionally, every local office within IDES has several different publications which notify an LEP recipient of our language services. There are posters and signs which hang in each office that a person can point to to identify which language is their preferred language. (See Exhibit 5, Language Poster). Employees are also trained to ask if they need a translator if their point of contact with the LEP individual is via the telephone. Additionally, IDES has a translation widget at the top of its public facing webpage which allows an LEP individual to choose which language they want the webpage translated into.

### **Web Translation Services and Notifications**

IDES internally notifies its employees of language services by posting information on the intranet. Specifically, the translation vendor's information is posted on the intranet for easy access for employees searching for interpreter services. Notice of language access services is also part of IDES policies and procedures which are also posted on the intranet.

### **New Employee Orientation Training**

Notice is also encompassed within IDES NEO trainings offered to all new IDES employees at the time of on boarding them into the agency. Training staff also offer LEP specific training to all employees via IDES' OneNet computer-based learning center.

### **Marketing/Informational Campaign**

Moreover, EO Office gives presentations and speeches to management and frontline staff which include language access information. Lastly, notice of language access services is made part and parcel of the partnership that IDES maintains with its community groups, stakeholders, and advocate partners.

### **Training Staff on Language Access Plan**

IDES trains its staff, workforce partners and the general public on its nondiscrimination policies and procedures, including those related to language access, throughout the year.

#### **Formal Language Access Training**

Whether it is formal training given in IDES NEO or on the OneNet or informal trainings given during monitoring visits to the local office, IDES management and staff are trained on a continual basis regarding its EO related policies and procedures including its one on LEP services.

#### **Executive Staff Training**

IDES' EO Office will continue to train all Executive Leadership in language access services and compliance. Topics to be covered in the Executive Leadership trainings are/will be on how to provide and ensure compliance with:

1. Language access in person
2. Language access via the telephone
3. Language access via the internet
4. Language access via the mail
5. Translation of vital documents

#### **Informal Language Access Training**

Additionally, the EO Officer speaks to various Divisions with IDES regarding the Department's policies and procedures which include the one on serving LEP individuals. Further, the EO Officer speaks bi-annually at the "Continuing Legal Education", or CLE conferences given by the Department to their attorneys regarding language access matters and other EO related policies and procedures.

#### **Professional Association Conference Participation**

IDES' EO Officer has also given presentations previously, and will continue to do so as requested, to the Illinois Chapter of the International Association of Workforce Partners, IAWP. Lastly, IDES' EO Officer has given presentations at the National Association of State Workforce Agencies or "NASWA" regarding compliance with USDOL Nondiscrimination Regulations including language access. (See Exhibit 2, IDES Policy and Procedure 1206, *Serving Clients with Limited English Proficiency*.)

## **D. Assessment of Illinois Demographics & Interactions with LEP Populations**

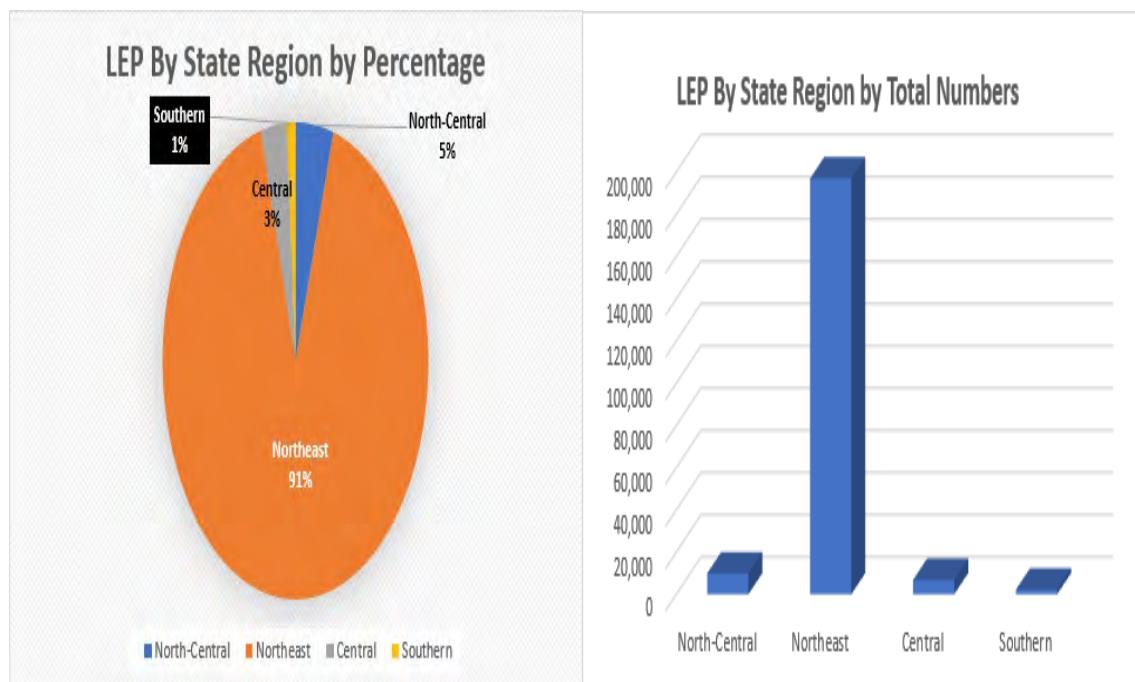
### **IDES Assessment of Demographics in Illinois of LEP Populations**

IDES has a Division that collects, analyzes, and distributes economic information including demographic information of various groups throughout that State of Illinois. This Division is referred to Economic Information and Analysis or EI&A. Under Illinois' WIOA Implementation Plan, IDES is designated as the State's primary provider of employment statistics; and, as such, EI&A develops and maintains the most comprehensive labor market

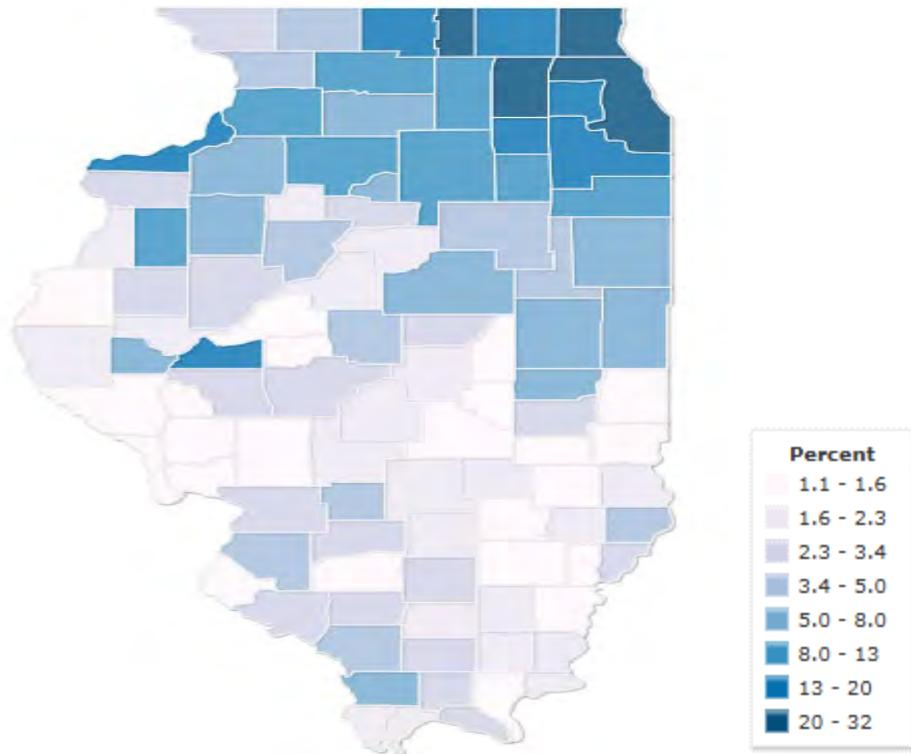
and career information programs in the State. The Division's statistical databases contain data it collects from IDES' own UI and ES systems, from the four statistical programs it administers for the U.S. Department of Labor, and from a variety of secondary sources such as the decennial census. EI&A analyzes and publishes this information for use by employers, job seekers, career counselors, government agencies, educators, and economic developers.

IDES uses the information provided by EI&A to assess and forecast its bilingual or language needs to ensure it is providing meaningful access to its services, benefits, and programs. Some information analyzed through this process is data of LEP households broken down by county for Illinois. (See Exhibit 7, Data on English Proficiency by Illinois County). Maps of Illinois counties show the density of our LEP communities which assist IDES in assessing, analyzing, and ensuring language access services are provided where they need to be.

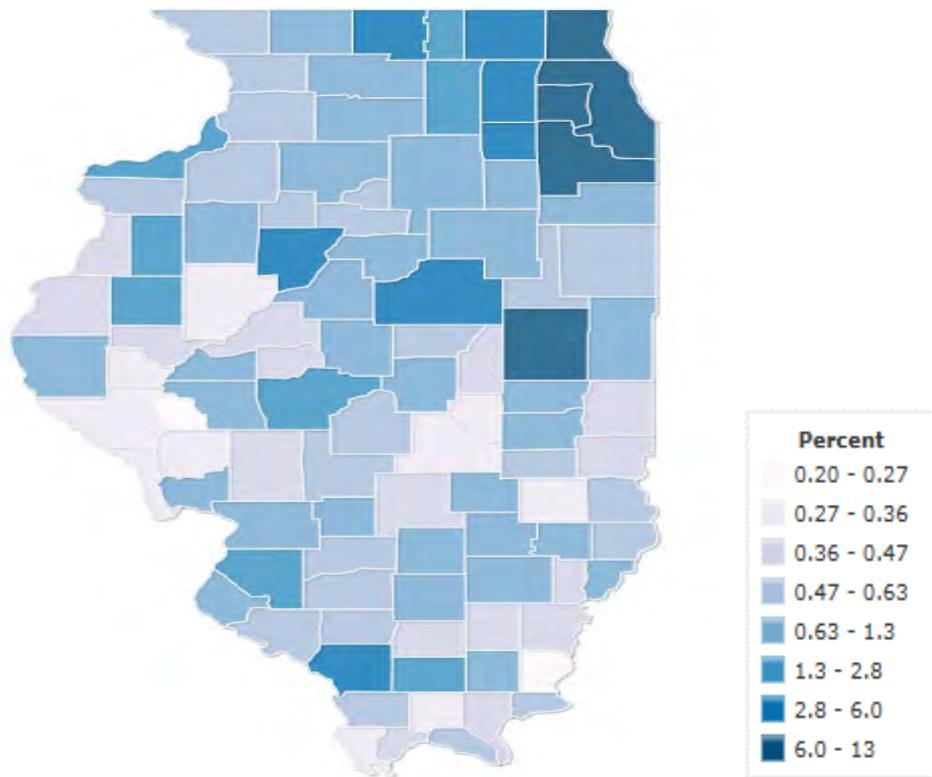
For example, the graphics provided below illustrate in what counties you will find significant percentages of LEP individuals, including Hispanic/Latino and Asian American populations. These maps help IDES to assess and determine how to best provide language access services by location throughout Illinois. As you can see the largest concentration of LEP individuals within Illinois is within the Northeast region.



Hispanic or Latino Origin Population Percentage by County:



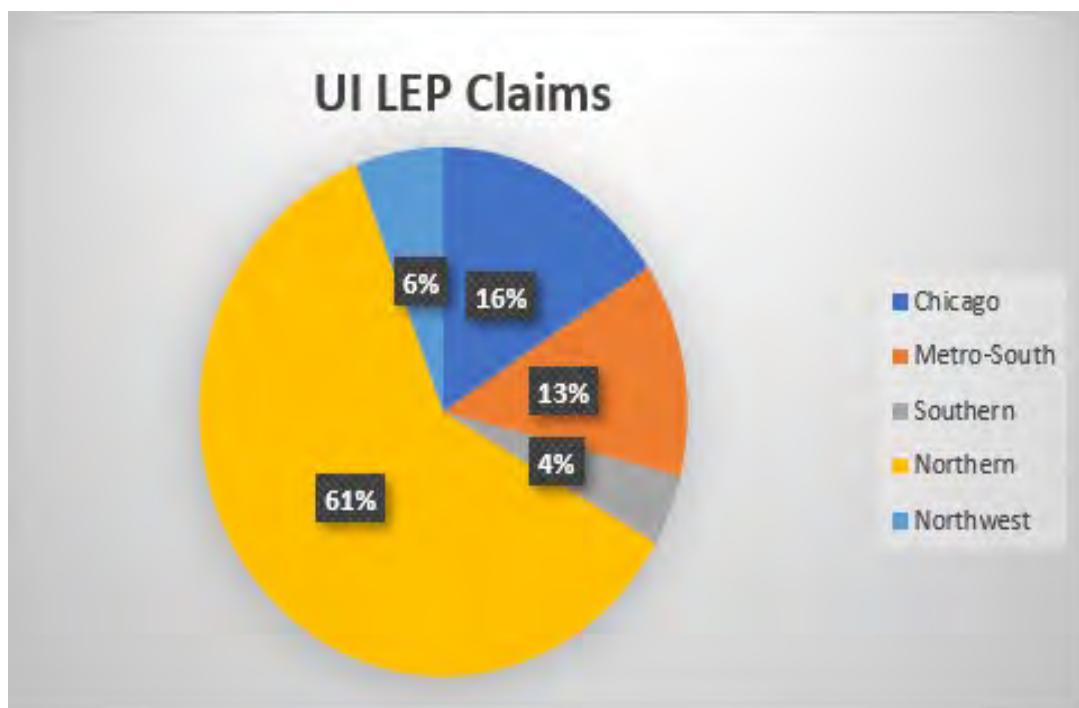
Asian American Population Percentage by County:



## **IDES Assessment on Interactions with LEP Individuals<sup>5</sup>**

IDES conducts an annual assessment, sometimes more, of its interactions with LEP individuals. This includes collecting data on LEP individuals that filed Unemployment Insurance claims and those needing IDES assistance at any point in its process via telephone interpretation. IDES uses data from the demographics as illustrated in the maps above, along with the data provided by IDES' telephonic interpreter services. IDES' EO Office then uses that data to analyze and assess its language access needs throughout the state by region. Based on its findings, it recommends additional bilingual positions to the Local Office service area ensuring meaningful language services.

Below, IDES used Unemployment Insurance claims filed or identified as LEP, by Region, to assess local needs. As you can see the largest amount of Unemployment Insurance LEP claims were filed in the Northern Region. Conversely, the smallest amount of UI LEP claims were filed in the Southern region. If you compare this data with the demographic data from the previous pages, you could see that there are very low percentages of both Hispanic and Asian American populations in our Southern regions.



## **Telephonic Assessment of Language Access Needs**

<sup>5</sup> This data is from program year beginning on July 1, 2022, through June 30, 2023, and/or program year beginning on July 1, 2023, through June 30, 2024, whichever is the latest monitoring review period completed.

Additionally, IDES reviews the telephonic calls for language assistance to understand the community it's serving and to provide meaningful language access. Below, you will see data from each of the five regions including what languages were requested and total of minutes needed for translation services region wide.

## **CHICAGO REGION**

The Chicago Region recorded 3,374 UI LEP claims for this program year.

### **Pilsen Local Office recorded requests for language interpreters:**

188 Request = 2,970.00 Minutes

- There were 131 language line calls for Spanish interpretation.
- There were 22 language line calls for Cantonese interpretation.
- There were 15 language line calls for Mandarin interpretation.
- There were 6 language lines calls for Swahili Interpretation.

### **Woodlawn Local Office recorded requests for language interpreters:**

374 Requests = 5655.00 Minutes

- There were 275 language line calls for Spanish interpretation.
- There were 49 language line calls for Cantonese interpretation.
- There were 16 language line calls for Mandarin interpretation.

### **Lawrence Local Office recorded requests for language interpreters:**

105 Request = 1,867.00 Minutes

- There were 50 language line calls for Spanish interpretation.
- There were 10 language line calls for Cantonese interpretation.
- There were 9 language line calls for Arabic interpretation.
- There were 5 language lines calls for Russian Interpretation.

## **METRO-SOUTH REGION**

The Metro-South Region recorded 2,793 UI LEP claims for the program year.

### **Harvey Local Office recorded requests for language interpreters as follows:**

1,056 Requests = 1,938.00 Minutes

- There were 501 language line calls for Spanish interpretation.
- There were 29 language line calls for Polish interpretation.
- There were 17 language line calls for Arabic interpretation.
- There were 48 language line calls for Cantonese interpretation.

### **Burbank Local Office recorded requests for language interpreters as follows:**

168 Requests = 3,212.00 Minutes.

- There were 3 language line calls for Cantonese interpretation.
- There were 132 language line calls for Spanish interpretation.
- There were 15 language line calls r Arabic interpretation.
- There were 13 language line calls for Polish interpretation.
- There was 1 language line call for Mandarin interpretation.

**Joliet Local Office** recorded requests for language interpreters as follows:

75 Requests = 1,428.00 Minutes

- There were 53 language line calls for Spanish interpretation.
- There were 1 language line calls for Mandarin and/or Cantonese interpretation.
- There were 7 language line calls for Arabic interpretation.
- There were 5 language line calls for French interpretation.

**SOUTHERN REGION**

The Southern Region recorded 929 UI LEP claims for the program year.

**Mt. Vernon Local Office** recorded requests for language interpreters as follows:

235 Requests = 2,921.00 Minutes

- There were 181 language line calls for Spanish interpretation.
- There were 3 language line calls for Mandarin interpretation.
- There were 7 language line calls for Arabic interpretation.
- There were 10 language line calls for Polish interpretation.
- There were 14 language line calls for Cantonese interpretation.

**Belleville Local Office** recorded requests for language interpreters as follows:

214 Requests = 5,357.00 Minutes

- There were 182 language line calls for Spanish interpretation.
- There were 7 language line calls for Arabic interpretation.
- There were 3 language line calls for French interpretation.
- There were 5 language line calls for Polish interpretation.
- There were 4 language line calls for Cantonese interpretation.
- There were 4 language line calls for Mandarin interpretation.

**Effingham Local Office** recorded requests for language interpreters as follows:

222 Requests = 5,373.00 Minutes

- There were 186 language line calls for Spanish interpretation.
- There were 1 language line calls for Hindi interpretation.
- There were 5 language line calls for Mandarin interpretation.
- There were 6 language line calls for Polish interpretation.
- There were 5 language line calls for Cantonese Interpretation.

**Springfield Local Office** recorded requests for language interpreters as follows:

745 Requests = 17,896.00 Minutes

- There were 625 language line calls for Spanish interpretation.
- There were 22 language line calls for Arabic interpretation.
- There were 18 language line calls for Polish interpretation.
- There were 14 language line calls for Cantonese interpretation.
- There were 13 language line calls for French interpretation.
- There were 4 language line calls for Russian interpretation.

## **NORTHERN REGION**

The Northern Region recorded 12,991 UI LEP claims for the program year.  
**Wheeling Local Office** recorded requests for language interpreters as follows:

971 Requests = 9,821.00 Minutes.

- There were 1,906 language line calls for Spanish interpretation.
- There were 38 language line calls for Cantonese interpretation.
- There were 59 language line calls for Arabic interpretation.
- There were 410 language line calls for Polish interpretation.

**North Aurora Local Office** recorded requests for language interpreters as follows:

511 Requests = 7,583.00 Minutes

- There were 417 language line calls for Spanish interpretation.
- There were 10 language line calls for Korean interpretation.
- There were 11 language line calls for Hindi interpretation.
- There were 13 language line calls for Polish interpretation.
- There were 16 language line calls for Arabic interpretation.

**Rockford Local Office** recorded requests for language interpreters as follows:

1,058 Requests = 2,512.00 Minutes

- There were 728 language line calls for Spanish interpretation.
- There were 17 language line calls for Cantonese interpretation.
- There were 21 language line calls for Arabic interpretation.
- There were 24 language line calls for Polish interpretation.

## **NORTHWEST REGION**

The Northwest Region recorded 1,241 UI LEP claims for the program year.

**Quincy Local Office** recorded requests for language interpreters as follows:

970 Requests = 3,664.00 Minutes

- There were 83 language line calls for Spanish interpretation.
- There were 8 language line calls for French interpretation.
- There were 2 language line calls for Pashto interpretation.
- There was 1 language line call for Mandarin interpretation.
- There were 0 language line calls for Arabic interpretation.

**Champaign Local Office** recorded requests for language interpreters as follows:

330 Requests = 9,580.00 Minutes.

- There were 153 language line calls for Spanish interpretation.
- There was 112 language line call for French interpretation.
- There were 19 language line calls for Chinese interpretation.

**Rock Island Local Office** recorded requests for language interpreters as follows:

**2,069 Requests = 29,381 Minutes**

- There were 1833 language line calls for Spanish interpretation.
- There were 38 language line calls for French interpretation.
- There were 38 language line calls for Polish interpretation.
- There were 14 language line calls for Chinese/Mandarin interpretation.
- There were 10 language line calls for Korean interpretation.
- There were 3 language line calls for Tagalog interpretation.
- There were 16 language line calls for Hindi interpretation.

**Peoria Local Office** recorded requests for language interpreters as follows:

**564 Requests = 10,875.00 Minutes**

- There were 301 language line calls for Spanish interpretation.
- There were 4 language line calls for Cantonese interpretation.
- There were 10 language line calls for Arabic interpretation.
- There were 15 language line calls for Vietnamese interpretation.
- There were 187 language line calls for French interpretation.
- There were 11 language line calls for Amharic / Hindi interpretation.

**Sterling Local Office** recorded request for language interpreters as follows:

**2,069 Requests = 29,381 Minutes.**

- There were 23 language line calls for Spanish interpretation.
- There were 1 language line calls for Arabic interpretation.
- There were 1 language line call for Ewe interpretation.
- There were 9 language line calls for French interpretation.
- There were 2 language line calls for Swahili interpretation.

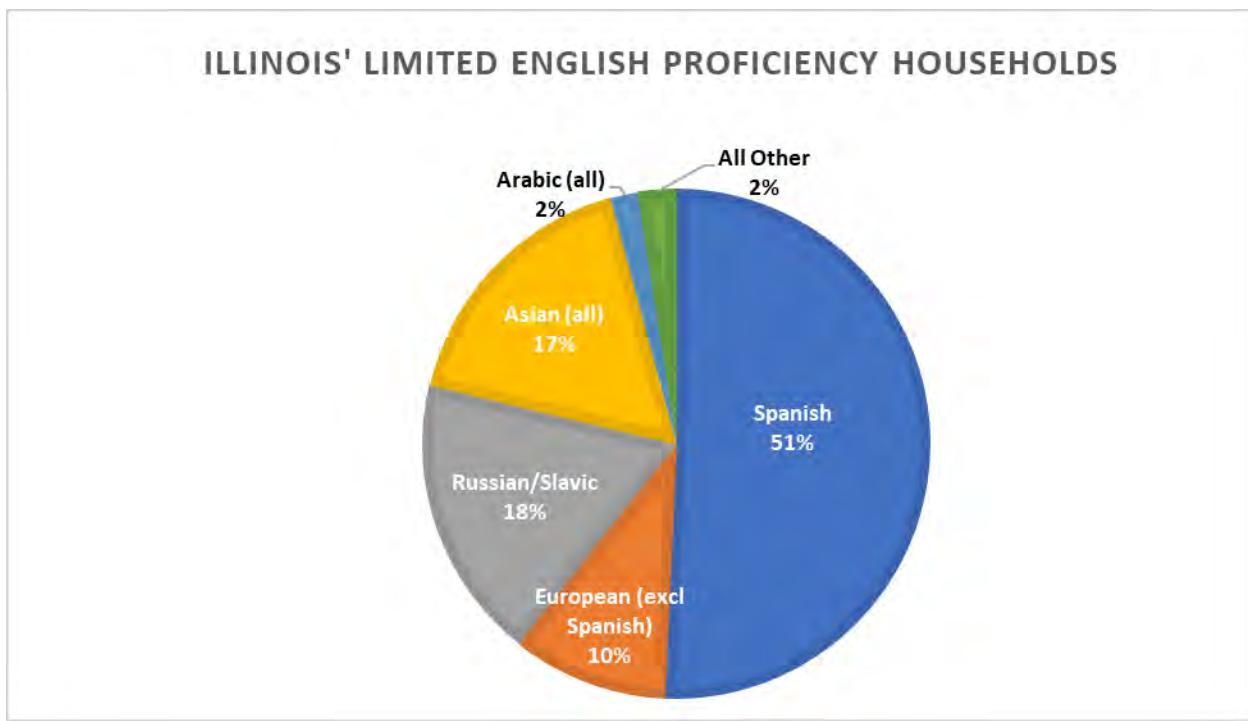
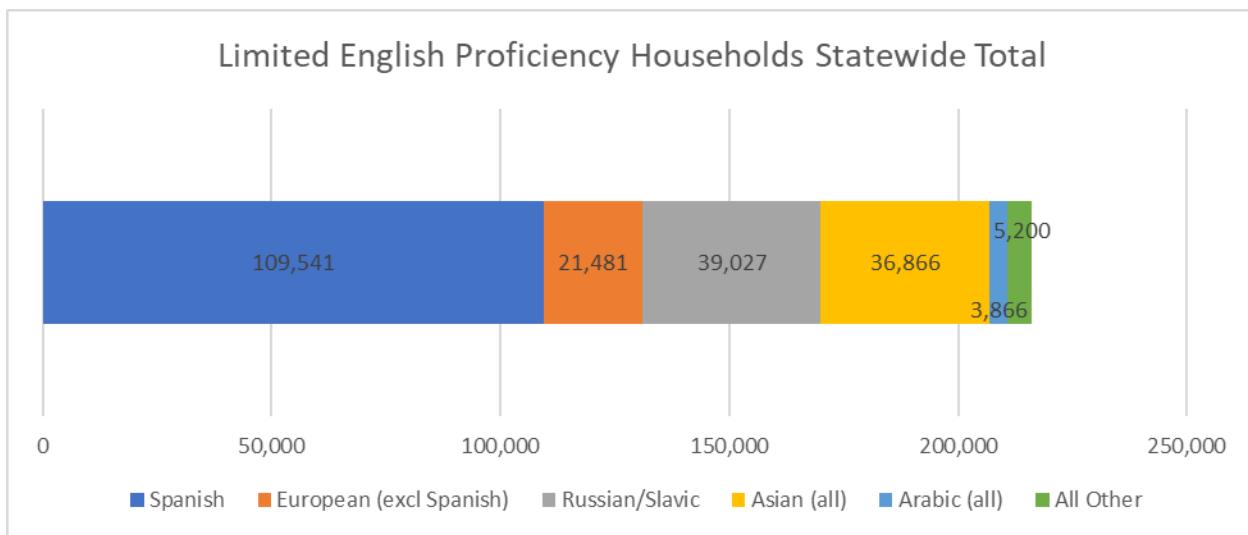
**Ottawa Local Office** recorded requests for language interpreters as follows:

**303 Requests = 118.47 Minutes**

- There were 396 language line calls for Spanish interpreters.
- There were 20 language line calls for Arabic interpreters.
- There were 29 language line calls for French interpreters.
- There were 13 language line calls for Polish interpreters.
- There were 15 language line calls for Swahili interpreters.

### **IDES Assessment on Languages Spoken**

IDES also assesses its language access needs for LEP populations based on which languages are most spoken throughout Illinois. As you can see Spanish is the most common language followed by other European languages, then Russian or Slavic languages, Asian, Arabic and then all other.



IDES uses all the data above, i.e., data on household demographics, telephonic interpretation services, and filing of LEP Unemployment Insurance claims, to assess and make recommendations regarding appropriate bilingual staffing and language services in each region we have a presence. This allows IDES to continue to ensure meaningful language access to LEP individuals regarding its services, benefits, and programs.

#### **E. Language Access Plan Update and Monitoring**

IDES will update and monitor the plan annually or as required and/or needed to ensure equal and meaningful services to both internal and external partners, stakeholders, employees, and claimants. Additionally, IDES continually monitors, updates, analyzes,

and reviews its language access services to ensure equal and meaningful access to its services, benefits and programs as required by USDOL Nondiscrimination Regulations. USDOL Nondiscrimination Regulations require that the Governor of each state continually review, revise, and update the States' Nondiscrimination Plan. The Regulations state in pertinent part:

**38.55 Schedule of the Governor's obligations regarding the Nondiscrimination Plan:**

- (a) Within 180 days of either January 3, 2017, or the date on which the Governor is required to review and update their Methods of Administration as determined by the schedule in § 37.55, whichever is later, a Governor must:
  - (1) Develop and implement a Nondiscrimination Plan consistent with the requirements of this part; and
  - (2) Submit a copy of the Nondiscrimination Plan to the Director.
- (b) **The Governor must promptly update the Nondiscrimination Plan whenever necessary, and submit the changes made to the Director in writing at the time that any such updates are made. [Emphasis added].**
- (c) Every two years from the date on which the initial Nondiscrimination Plan is submitted to the Director under paragraph (a)(2) of this section, the Governor must review the Nondiscrimination Plan and the manner in which it has been implemented and determine whether any changes are necessary in order for the State to comply fully and effectively with the nondiscrimination and equal opportunity provisions of WIOA and this part. (1) If any such changes are necessary, the Governor must make the appropriate changes and submit them, in writing, to the Director.

Furthermore, IDES understands that ensuring meaningful and equal access to its services, benefits, and programs to the LEP community is a fluid and ever-changing process. Fluctuations with community demographics, migration, and other extenuating circumstances all effect what equal and meaningful language access truly is.

**Gathering, Tracking, and Recording Language Preference Data**

There are various ways that IDES tracks, gathers and records language preference information. USDOL Nondiscrimination Regulations require that such data be tracked and recorded to be in compliance with their standards. 29 CFR 38, Section 38.41 states in pertinent part:

**§ 38.41 Collection and maintenance of equal opportunity data and other information.**

- (b)(1) Each recipient must collect such data and maintain such records, in accordance with procedures prescribed by

the Director, as the Director finds necessary to determine whether the recipient has complied or is complying with the nondiscrimination and equal opportunity provisions of WIOA or this part.

It specifically requires the Governor of each State, including Illinois, to keep proper records regarding its benefits, services, and programs, including records on the LEP community and language access. 29 CFR 38, Section 38.53 states in pertinent part:

**§ 38.53 Governor's oversight responsibilities regarding recipients' recordkeeping.**

The Governor must ensure that recipients collect and maintain records in a manner consistent with the provisions of § 38.41 and any procedures prescribed by the Director under § 38.41(a). The Governor must further ensure that recipients are able to provide data and reports in the manner prescribed by the Director.

**Language Tracking Software**

Also, language preference is tracked in the Unemployment Service software, known as IBIS. Once an individual is identified as having a “preferred language” as something other than English, this preferred language will follow them through the system. Also, language preference is tracked, recorded, and analyzed during our annual EO Monitor reviews of each Local Office.

This data is reviewed to ensure compliance with nondiscrimination laws, rules, and regulations on both a Federal and State level. IDES also uses data provided by the federal government to analyze and record information regarding its LEP claims and language access.

**F. Language Access Plan Partnerships**

**Collaborating with LEP Communities and Stakeholders**

IDES collaborates with a variety of LEP community advocates and stakeholders to ensure its language access requirements and LEP communities’ needs are met.

IDES also collaborates with members of advisory councils comprised of members appointed by the Governor.

These advisory councils are:

- The Hispanic Employment Plan Advisory Council;
- The Asian American Employment Plan Advisory Council;
- The Native American Employment Plan Advisory Council;
- The Jewish United Fund; and
- Illinois Language Justice Coalition

## **G. Language Access and the Diversity, Equity, Inclusion & Accessibility Plan**

### Language Access via the Diversity, Equity, Inclusion and Accessibility Plan

In addition to these collaborations, IDES also has incorporated and strengthened its partnerships with the LEP community by incorporating language access into its Diversity, Equity and Inclusion Plan goals and objectives. The DEI Plan is a priority for IDES which includes several languages access goals and initiatives for which they must update and maintain performance metrics on. EO Office has partnerships with various community groups and will continue to maintain and support those partnerships, including those relating to language access. IDES' DEIA Mission Statement illustrates its commitment to DEIA including providing meaningful language access. IDES' DEIA Mission Statement states:

IDES fosters a respectful, accepting, and inclusive work environment for all by ensuring that Diversity, Equity, Inclusion, and Accessibility (DEIA) are interwoven within every aspect of IDES operations, policies, procedures, and outreach efforts. IDES actively engages with its employees and in the diverse communities it serves through thoughtful economic analyses, equitable services, and inclusive, impactful DEIA initiatives. IDES aspires to achieve these DEIA principles in all aspects of our mission, to continually review and improve the way it operates and to evaluate its programs, services, and benefits through an inclusive and meaningful DEIA lens.

## **H. Translation of Vital Documents**

Field staff are informed and encourage to contact the EO Office for assistance when translating documentation into an LEP individual's preferred language. EO Office will then engage a paid bilingual employee, when available, or the master contract vendor for translation of the documentation. (See Exhibit 2, IDES Policy and Procedure 1206, *Serving Clients with Limited English Proficiency*). Additionally, IDES will use the ETH to assist in the translation of written materials or documents as soon as it is deployed and available as stated previously.

A "vital document" is either paper or electronic written material that contains information that is critical for accessing IDES' benefits, program, or activities, or is required by law. IDES is working to make all vital documents readily accessible in the following languages: English, Spanish, Polish, Mandarin, Arabic, Cantonese, Hindi, Gujarati, Korean, Russian, Tagalog, Urdu, Ukrainian, and Vietnamese. However, all requests for translation services, even outside these languages enumerated above, will be made available upon request free of charge.

Vital documents include, but are not limited to:

- Applications;
- Consent forms;
- Complaint forms;
- Intake forms;
- Letters or notices pertaining to eligibility for benefits;
- Letters or notices pertaining to rights and the reduction, denial or termination of services or benefits or that require a response from the LEP person;
- Written tests that test competency for a particular license, job, or skill for which knowing English is not required;
- Documents that must be provided by law; and
- Notices regarding the availability of free language assistance services for LEP individuals.

(See Exhibit 3, IDES Appendix of “vital documents”). IDES lists some of the specific documents it considers vital within Exhibit 3. Please see Exhibit 3 for more details.

IDES Policies and Procedures outline “vital documents” in section 1206, Serving Clients with Limited English Proficiency. Clients with Limited English Proficiency must be provided meaningful access to IDES benefits, programs, and services. An LEP client is a person whose primary language is a language other than English and who requires interpretation and/or translation services to meaning fully and effectively participate in IDES services, benefits, and programs. (See Exhibit 3, IDES Appendix of “vital documents”).

Under no circumstances shall services to an LEP client be denied or unnecessarily delayed because of the client’s Limited English Proficiency. Where possible, an LEP client should be served by a language option employee who speaks the client’s language. When no on-site interpreter is available, the telephone-accessed language interpreter service vendor under contract with CMS and/or IDES should be used. In order to maintain compliance with federal and state regulations, laws and administrative rules ensuring language access, IDES has designated a Language Access Coordinator.

IDES prioritizes translation of vital documents. Classification of a document as “vital” depends upon the importance of the program, information, encounter, or service involved, and the consequence to the LEP person if the information in question is not provided accurately or in a timely manner.

IDES commits to ensuring equal and meaningful access to all vital documents to the LEP community. IDES will translate into the LEP client’s preferred language all “vital documents” requested by the LEP individual being served. (See Exhibit 3, IDES Appendix of “vital documents”).

## **I. Notification & Communication on Available Language Assistance Services**

Staff inform LEP individuals about available language assistance services through posters and signs hanging in our local offices. IDES also has resources posted on the public facing webpage regarding language access services it offers and through employee training and onboarding so that employees who are the first point of contact for the LEP individual know how to offer the translation services to someone identified as an LEP individual or someone who has a language preference other than English.

### **Posters**

IDES has several multilingual notices and/or posters predominantly hung throughout its local offices as they are the first point of contact (POC) with the public. These posters and/or notices inform the public that IDES complies with all nondiscrimination laws, specifically all "Equal Opportunity" laws. (See Exhibit 5, Language Poster).

The "Equal Opportunity is the Law" Notice (in various languages) is required signage in all comprehensive and affiliate locations, including all training providers. The posters are supplied to all local agencies whenever changes are made and are physically verified during the on-site and/or desk audit annual EO monitoring reviews. All recruitment brochures (i.e., forms, flyers, posters, broadcasts, and publications) and other materials that are ordinarily distributed or communicated in written, oral, electronic and/or paper form, to staff, clients or to the public at large, include the EO tagline as well as the availability of auxiliary aids and services with the applicable TTY/TDD or relay number anytime a standard telephone number is published.

The "Equal Opportunity Is the Law" statement is posted prominently for the benefit of the public and clients in all the Department's Consolidated Unemployment Insurance and Employment Services Offices (hereinafter referred to as "UI/ES Offices"), as well as in appropriate locations in the Central Office. Posters are available in multiple other languages in addition to English, i.e., Spanish, Polish, Hindi, Tagalog, Chinese and/or Arabic. Provisions are made to include this statement of nondiscrimination on all UI claim and ES applications.

This "EO Is the Law" Notice is permanently mounted in every Department of Employment Security Office. Notices are permanently displayed and the Department's EO Officer has on file a written confirmation from each Manager attesting to the fact that the Poster is being prominently displayed. When the EO Monitors conduct their site visits of each local IDES Office, additional follow-up occurs because they check to determine if the Posters are being prominently displayed as well.

### **Identification of Language Needs of LEP Individuals**

Staff will identify the language needs of LEP individuals when the LEP individual points to their preferred language poster or sign when coming into one of IDES' local offices. Another way staff will identify an individual preferred language is when a caller identifies their preferred language during a call with one of IDES call center agents. Should IDES not have a bilingual employee on staff, the employee is trained to call IDES' third-party

telephony translation service provider. (*See* Exhibit 4, Telephonic Interpreting Services Instruction Sheet).

### **U.S. Postal Mail and Email Correspondence from LEP Individuals**

Federal USDOL Regulations require IDES to provide equal and meaningful access to our services, benefits, and programs and to communicate with LEP individuals in their preferred language when possible. IDES is working on several multilingual projects to ensure compliance with this. IDES currently engages a 3<sup>rd</sup> party vendor to translate documents into a person's preferred language, upon request. Additionally, IDES is working on deploying a software program which assists in the translation of written communication. This "Enterprise Translation Hub" or ETH is a pilot program where IDES is working with a vendor to use a translation portal to translate all documents. This would allow IDES to easily transcribe all of its documents into various languages almost instantaneously. IDES also uses its paid bilingual employees to interface with LEP individuals.

#### **IDES provides the following access via U.S. Postal Mail and/or Email**

1. Third party vendor for translation of all documents and/or other written materials used in communication with the public;
2. Enterprise Translation Hub used to assist with translation of documents and/or other written materials used in communication with the public; and
3. Bilingual employees used to interpret and/or correspond with the public via written communications.

## **J. Point of Contact Processes & Procedures to Ensure Meaningful Language Access**

### **Language Interpreter Services**

IDES will use the already procured master contract and engage the telephony translation service provider for live translations. IDES will also engage its other vendors for other various translation needs including written communication. Further, IDES will engage its bilingual employees to assist with the in-person interpretation needs, when available. Besides these methods of ensuring appropriate language interpretation, IDES also engages community groups and/or committees and/or councils to partner with them ensuring equitable language access services are provided.

### **Telephone Contact**

In case of contact over the telephone with an LEP individual, the IDES employee will use the Propio Telephonic Interpreting Services Instruction Sheet to obtain a translator on the call with the LEP individual seeking services. The IDES employee will call the Propio number, enter in a code, and select the language they need to assist the LEP caller. (*See* Exhibit 4, Telephonic Interpreting Services Instruction Sheet).

### **Telephone or Video Interpreter Services**

Staff will access telephone or video interpreter services by either utilizing paid bilingual employees, engaging with our 3<sup>rd</sup> party interpretation service vendors, or by using the Illinois Relay Services. Staff use an information card provided by IDES' telephony translation service vendor to access interpreter services. Staff also contact the EO Office

for assistance, when necessary, i.e., manual communication or sign language interpreter is required. Staff are also trained on the use of Illinois Relay Services, or 711. All of this information is posted on the intranet, in training modules and when EO Office trains or speaks with the employees. (See Exhibit 1, IDES EO Policies and Procedures, P&P 1205, “*Accommodating Individuals with Disabilities*,” see also Exhibit 4, Telephonic Interpreting Services Instruction Sheet).

**IDES Staff shall:**

1. Determines the preferred language.
2. If the client contact is in person, takes the client to a suitable location for a conference call by speaker telephone. If the client contact is by telephone, asks the caller to please stay on the line and places the caller on hold. If three-way calling is available at the staff person’s workstation, obtains a second dial tone and adds the non-English speaking person to the line. If not, tells the client that he will be contacted (using the interpreter’s conference capability) within the next few minutes.
3. Secures the services of an interpreter by following the instructions on the vendor’s instruction card.
4. When the interpreter comes on the line and, in the presence of the client, briefly explains the purpose of the interview.

**.205 IBIS Entry**

The representative must enter the LEP claimant’s preferred language on the Personal Information screen using the LEP dropdown menu. If the preferred language is not in the list, select Other from the dropdown menu and then manually insert the preferred language in the Other field.

(See Exhibit 4, Telephonic Interpreting Services Instruction Sheet).

**Local Office**

When an LEP individual enters one of our Local Offices they will immediately see a “IF YOU NEED A FREE INTERPRETER, PLEASE POINT TO YOUR LANGUAGE” Poster (Language Poster). (See Exhibit 5, Language Poster). The LEP individual will then point to their preferred language on the poster. The IDES employee will then get a bilingual IDES employee to assist this claimant in their preferred language. If IDES does not have an employee at that location that speaks the claimant’s preferred language, that IDES employee will call the Propio Language Line and get a telephonic interpreter to speak to the claimant in their preferred language. (See Exhibit 5, Language Poster).

**Unemployment Insurance Appeals Hearing**

When an LEP individual is scheduled for an UI Appeals hearing, the UI system or IBIS, will already have identified the claimant’s preferred language. The Administrative Law Judge, when preparing for the UI Appeals hearing, will order an interpreter in the claimant’s preferred language ahead of time. The interpreter will be scheduled to call into the hearing and translate the proceedings in real time.

### **Qualified Bilingual Staff**

Only “qualified” bilingual employees are allowed to interpret or provide language access services to IDES’ LEP clients. USDOL Regulations require services not only be bilingual but that the bilingual employee providing the service be “qualified” to interpret in that language. According to 29 CFR 38, Section 38.4, it states:

(xx) *Qualified interpreter* means an interpreter who is able to interpret effectively, accurately, and impartially, either for individuals with disabilities or for individuals who are limited English proficient. The interpreter must be able to interpret both receptively and expressively, using any necessary specialized vocabulary, either in-person, through a telephone, a video remote interpreting (VRI) service, or via internet, video, or other technological methods.

Therefore, only qualified bilingual employees who are paid and officially recognized as being proficient in the bilingual language are authorized to provide language services. IDES bilingual staff are identified as such and placed in the community field offices which require those services to provide equal and meaningful language access to our services, programs and benefits. Additionally, the EO Office and Human Resources Department maintain a list of paid bilingual employees and staff are encouraged to contact EO or Human Resources for bilingual assistance when needed.

### **K. Ensuring Proficiency of Qualified Bilingual Staff**

IDES administers language aptitude tests prior to certifying the employee in the bilingual language. (See Exhibit 2, IDES Policy and Procedure 1206, *Serving Clients with Limited English Proficiency*).

According to USDOL Nondiscrimination Regulations found in 29 CFR 38.4, “Definitions,” a qualified interpreter for language access means:

(xx) Qualified interpreter means an interpreter who is able to interpret effectively, accurately, and impartially, either for individuals with disabilities or for individuals who are limited English proficient. The interpreter must be able to interpret both receptively and expressively, using any necessary specialized vocabulary, either in-person, through a telephone, a video remote interpreting (VRI) service, or via internet, video, or other technological methods.

(1) Qualified interpreter for an individual with a disability includes, for example, a sign language interpreter, oral transliterator, and cued-language transliterator. When an interpreter is provided to a person with a disability, the qualified interpreter must be able to sign or otherwise communicate effectively, accurately, and impartially, both

receptively and expressively, using any necessary specialized vocabulary.

(2) Qualified interpreter for an individual who is limited English proficient means an individual who demonstrates expertise and ability to communicate information effectively, accurately, and impartially, in both English and the other language, and identifies and employs the appropriate mode of interpreting (e.g., consecutive, simultaneous, or sight translation).

## **L. Language Access Complaint Process**

USDOL Nondiscrimination Regulations provide that IDES must administer its services, benefits, and programs consistent with the regulations including providing equal and meaningful access to LEP individuals. USDOL, Civil Rights Center, also implements a complaint process as part of their regulations. This complaint process includes language access complaints and is detailed in 29 CFR 38, Subpart D.

According to 29 CFR 38, Section 38.69, it states in pertinent part:

### **Complaint Processing Procedures**

#### **§ 38.69 Complaint filing.**

(a) Any person or the person's representative who believes that any of the following circumstances exist may file a written complaint: (1) A person, or any specific class of individuals, has been or is being discriminated against on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, political affiliation or belief, citizenship status, or participation in any WIOA Title I- financially assisted program or activity as prohibited by WIOA or this part. (2) Either the person, or any specific class of individuals, has been or is being retaliated against as described in.

USDOL Nondiscrimination Regulations also detail specific complaint processing procedures regarding language access that recipients like IDES must follow in order to comply. 29 CFR 38, Section 38.72 states:

#### **§ 38.72 Required elements of a recipient's complaint processing procedures.**

(a) The procedures that a recipient adopts and publishes for processing complaints permitted under this part and WIOA Section 188 must state that the recipient will issue a written

Notice of Final Action on complaints within 90 days of the date on which the complaint is filed.

(b) At a minimum, the procedures must include the following elements:

(1) Initial, written notice to the complainant that contains the following information: (i) An acknowledgment that the recipient has received the complaint; and (ii) Notice that the complainant has the right to be represented in the complaint process; (iii) Notice of rights contained in § 38.35; and (iv) Notice that the complainant has the right to request and receive, at no cost, auxiliary aids and services, language assistance services, and that this notice will be translated into the non-English languages as required in §§ 38.4(h) and (i), 38.34, and 38.36.

(2) A written statement of the issue(s), provided to the complainant, that includes the following information: (i) A list of the issues raised in the complaint; and (ii) For each such issue, a statement whether the recipient will accept the issue for investigation or reject the issue, and the reasons for each rejection.

(3) A period for fact-finding or investigation of the circumstances underlying the complaint.

(4) A period during which the recipient attempts to resolve the complaint. The methods available to resolve the complaint must include alternative dispute resolution (ADR), as described in paragraph (c) of this section.

(5) A written Notice of Final Action, provided to the complainant within 90 days of the date on which the complaint was filed.

Complaints regarding any suspected violation based on National Origin, including language access, may be filed with the USDOL, Civil Rights Center as outlined above. Additionally, LEP individuals may also file complaints with the Equal Employment Opportunity Commission, the Illinois Department of Human Rights or internally with IDES' EO Office. IDES now includes "Language Access" as a basis for a discrimination and/or harassment complaint that can be investigated. (See Exhibit 6, IDES External Complaint Form in both English and Spanish).

Further, Federal and State regulations require that IDES have signs posted in the Local Offices identifying the information for the EO Office so that they may file a complaint of discrimination or harassment should they need to.

This public identification of the EO Office is required by Federal and State laws, rules, and regulations. Also, people may file a complaint by going onto the IDES public facing website where a complaint form is posted for easy reference and access. All complaints filed with the EO Office will be reviewed and/or investigated and/or referred to appropriate divisions for handling. (See Exhibit 1, IDES EO Policies and Procedures).

LEP complaints should be sent to:

IDES Equal Opportunity Office  
Attention: IDES Investigations Unit  
115 S. LaSalle Street, 17<sup>th</sup> Floor  
Chicago, Illinois 60603  
Office: 312-793-9290  
Fax: 312-793-0302

IDES assures that all language access complaints received will be reviewed, investigated, and recommendations made and/or remedial actions taken, when appropriate. Any unresolved complaints may be brought to the attention of the Governor's Office of New Americans at [GOV.NewAmericans@illinois.gov](mailto:GOV.NewAmericans@illinois.gov).

## **IX. Continued Monitoring, Evaluation, and Reporting**

The Monitoring, Evaluation, and Reporting section of the Language Access Plan delineates the implementation strategies and procedural frameworks that IDES employs to ensure compliance with the Illinois Language Equity and Access Act. It also details the methodologies used to assess the effectiveness of the Language Access Plan, including the execution of its associated action items.

This Plan documents the established practices for monitoring and collecting data related to language access, analyzing patterns of language use and the corresponding need for language assistance, and engaging with community stakeholders through structured feedback mechanisms. These efforts are instrumental in informing ongoing improvements to both the Language Access Plan and the delivery of language assistance services provided by IDES.

### **Overview of Standard**

In alignment with the Illinois Language Equity and Access Act, IDES has actively collaborated with the Governor's Office of New Americans to oversee and evaluate the implementation of its Language Access Plan, thereby ensuring sustained compliance with statutory requirements. The agency has conducted regular, individualized assessments of language assistance needs and trends in language usage. These assessments informed the integration of updated data and performance indicators into successive iterations of the Language Access Plan, as mandated by Section 25(d)(3) of the Act. The insights derived from these evaluations were used to measure the efficacy of existing policies and practices and to support the continuous refinement of language access services delivered by IDES.

The Language Access Plan is a dynamic and evolving framework, designed to respond to the changing needs of the communities we serve. IDES remains committed to the continuous review and analysis of language access data, community feedback, and Service Delivery outcomes. Through regular evaluation and stakeholder engagement, the Plan will be refined and updated to ensure it remains responsive, equitable, and aligned with statutory obligations and best practices. As demographic trends shift and new language needs emerge, IDES will

adapt its strategies to ensure meaningful access for all LEP individuals. This ongoing process reflects our agency's dedication to equity, transparency, and continuous improvement. By treating the Language Access Plan as a living document, we reaffirm our commitment to building a more inclusive and accessible public service environment for all Illinois residents.

## **X. Language Access Plan Contact Information**

For more information on IDES' Language Access Plan or language access services please contact IDES' Equal Opportunity Office. They can be reached at the following:

IDES Equal Opportunity Office  
Attention: Language Access Coordinator  
115 S. LaSalle Street, 17<sup>th</sup> Floor  
Chicago, Illinois 60603  
Office: 312-793-9290  
Fax: 312-793-0302

## **XI. Resources, Exhibits and Appendix**

For more information regarding resources and exhibits referred to herein please see the following pages of policies, procedures, regulations, and attachments and/or contact the LAC identified above.

# **Exhibit 1**

**IDES Equal Employment Opportunity  
Policies and Procedures**

**1200 UNLAWFUL DISCRIMINATION; REASONABLE ACCOMMODATION; EQUAL EMPLOYMENT OPPORTUNITY/AFFIRMATIVE ACTION: STATEMENT OF POLICY**

**.10 PURPOSE**

The purpose of this Section 1200 and the other Sections in the 1200 series of the Manual (1200 series) is to identify IDES policies and related procedures in IDES employment, programs, and activities regarding: (a) unlawful discrimination; (b) reasonable accommodation; and (c) equal employment opportunity and affirmative action. IDES is committed to providing employment, programs, and service environments free of unlawful discrimination, harassment, and retaliation. To further these objectives, IDES is dedicated to providing EEO/EO training for new hires, employees, and management, when possible, given available resources.

**.15 DEFINITIONS**

Unless otherwise provided, the following terms have the following meanings for purposes of the 1200 series:

*State and Federal legal authority:* Legal mandates including, without limitation, the Illinois Human Rights Act, Titles VI and VII of the Civil Rights Act of 1964, the Rehabilitation Act of 1973, Section 188 of the Workforce Innovation and Opportunity Act of 2015, the Americans with Disabilities Act of 1990 (ADA), the ADA Amendments Act of 2008, the Genetic Information Non-Disclosure Act of 2008, and all applicable rules, regulations, judicial orders and decrees, executive orders, and administrative orders, determinations, guidance, manuals, discussion letters, and guidelines.

*Unlawful discrimination:* Discrimination in violation of State and Federal legal authority against a person based on the person's race, color, religion, sex, national origin, citizenship, age, disability, political affiliation, or belief, unfavorable (except a dishonorable) discharge from military service, military status, ancestry, marital status, pregnancy, sexual orientation, genetic information, or any other lawfully protected personal characteristic. Unlawful discrimination includes ***unlawful harassment, unlawful retaliation, and refusal of reasonable accommodation*** (see definitions below).

*Unlawful harassment:* A form of unlawful discrimination where a person is harassed based on the person's race, color, religion, sex, national origin, citizenship, age, disability, political affiliation, or belief, unfavorable (except a dishonorable) discharge from military service, military status, ancestry, marital status, sexual orientation, genetic information, or any other lawfully protected personal characteristic and/or protected basis per Federal/State rules, laws or statutes.

*Unlawful retaliation:* A form of unlawful discrimination where a person is retaliated against for: (i) opposing what the person believes to be unlawful discrimination; (ii) making a charge, filing a complaint, or testifying, assisting, or participating in an investigation, proceeding, or hearing regarding what the person believes to involve unlawful discrimination; or (iii) requesting, attempting to request, using, or attempting to use a reasonable accommodation. **Note:** A person may be disciplined up to and including being sanctioned, terminated or discharged if their opposition, participation, or request was unreasonable and done in bad faith.

*Reasonable accommodation:* See Section 1205 of this Manual for the definition of reasonable accommodation in connection with persons with known disabilities. See Section 1207 of this Manual for the definition of reasonable accommodation in connection with IDES employee religious practices. Refusal of reasonable accommodation is a form

of unlawful discrimination unless IDES can show that it would be an undue burden to grant the request.

*Equal opportunity and affirmative action:* The equal opportunity and affirmative action requirements applicable to IDES employment, programs, and services under state and federal legal authority.

*EO Officer:* The IDES Equal Opportunity/Equal Employment Opportunity Officer is appointed by the Director with the approval of the Illinois Department of Human Rights and manages the EEO/AA Office.

*EEO/AA Office:* The IDES Office of Equal Employment Opportunity/Affirmative Action and all related staff and agents.

**.20 POLICY**

It is IDES policy to fully comply with all State and Federal legal authority that: (a) prohibits unlawful discrimination; (b) requires reasonable accommodation of known disabilities and employee religious practices; and (c) promotes equal employment opportunity and affirmative action in connection with IDES employment, programs, services, and activities.

Unlawful discrimination is prohibited in connection with the terms and conditions of IDES employment, including without limitation, work privileges and benefits, job actions, and personnel transactions (e.g., recruitment, examination, appointment, training, promotion, retention). (See Central Management Services (CMS) Personnel Rule 302.7090). Unlawful discrimination is prohibited in connection with IDES programs, services, and activities by, among other practices, ensuring meaningful access to all IDES clients. It is the responsibility of each IDES employee, agent, and contractor to refrain from unlawful discrimination.

Maintaining IDES employment, programs, services, and activity environments in compliance with this policy is an essential component of IDES' mission. It is the right of each IDES employee, agent, and contractor to work in, and each IDES client to access IDES programs and services in, environments free from unlawful discrimination. The Department will aggressively pursue violations of this policy and the requirements of the 1200 series. A Department employee, agent, or contractor and/or vendor may be subject to discipline, up to and including discharge or termination, and a Department client or member of the public may be subject to sanctions, for committing any violation under the 1200 series.

Inquiries may be directed to the EO Officer and the EEO/AA Office at 115 South LaSalle Street, 17<sup>th</sup> Floor, Chicago, Illinois 60603, Voice: 312-793-9290 or 312-793-9350, Fax: 312-793-0302, TTY: 888-340-1007.

**.30 RESPONSIBILITY OF MANAGERS AND SUPERVISORS**

IDES managers and supervisors should be alert to the conduct of their staff and promote a professional environment by setting examples of appropriate conduct and dealing with unlawful discrimination as with all other forms of employee misconduct. Managers and supervisors are the first line of defense, often being the first to spot discriminatory, harassing, or retaliatory conduct, and the first to receive complaints about that conduct. Managers and supervisors must report ***all*** complaints, allegations, and perceived incidents of unlawful discrimination to the EO Officer, even if the complaining party does not want to make a formal complaint. Managers and supervisors must take prompt action in coordination with the EO Officer and the EEO/AA Office to eliminate unlawful discrimination and must observe strict confidentiality on a "need to know" basis.

**.40 EQUAL OPPORTUNITY/AFFIRMATIVE ACTION PLAN AND MONITORING**

As set forth in the Department's Affirmative Action Plan approved by the Illinois Department of Human Rights, the EEO/AA Office works with the IDES Human Resources Division and/or in conjunction with CMS to ensure affirmative recruitment to broaden the applicant pool in the classifications and for the organizational units in which few or no minorities, women, or disabled persons are currently employed.

Human Resource Management maintains the recruitment announcements and selection activities which include, but are not limited to, retention of all records contained in each individual's selection package. The selection package contains the applications (bids) for the position, documentation of the selection made as a result of any interviews, the decision made regarding selection, copies of issued selection notices, the acceptance or non-acceptance memorandum if prepared by the applicant, and the DHR-19 Hiring Monitor or DHR-20 Promotion Monitor Form processed by the EO Officer or designee. (See Section 1203 of this Manual.)

The Department's EEO/AA monitoring focuses on selection or rejection decisions in filling vacancies and promotions. Department management shall work constructively with the EO Officer or designee to analyze problem areas in staffing or service with respect to equal opportunity and affirmative action and assists in providing definitive solutions.

**.50 TRAINING**

The Department is committed to train new hires and employees, including management, about the policies and related procedures specified in the 1200 series. The Department shall provide training consistent with available resources and may provide training in-house or through suitable outside sources (e.g., the Illinois Department of Human Rights; the Illinois Department of Central Management Services; etc.).

**.60 REFERENCES**

Title VII of the Civil Rights Act of 1964 (42 USC 2000e)

The Americans with Disabilities Act of 1990 (42 USC 12101)

The ADA Amendments Act of 2008 (42 USC 12101 Note)

Section 504 of the Rehabilitation Act of 1973 (29 USC 794)

The Genetic Information Non-Disclosure Act of 2008 (42 USC 2000ff)

The Pregnancy Discrimination Act of 1978 (42 USC 2000e(k))

The Age Discrimination in Employment Act of 1967 (29 USC 621)

Equal Pay Act of 1963 (29 USC 206(d))

Section 188 of the Workforce Innovation and Opportunity Act of 2014 (29 USC 2938)

U.S. Department of Labor (29 CFR 32)

U.S. Department of Labor Nondiscrimination Regulations (29 CFR 38)

The regulations of the U.S. Equal Opportunity Commission (29 CFR Parts 1600 - 1699)

The Illinois Human Rights Act of 1980 (775 ILCS 5/)

The regulations of the Department of Human Rights and the Human Rights Commission (56 Ill. Adm. Code Parts 2500-2540)

Section 302.790 of the Personnel Rules of the Department of Central Management Services (80 Ill. Adm. Code 302.790)

Section 1201, EEO/EO Complaint Procedures, of the Procedures Manual

Section 1202, Unlawful Harassment and Unlawful Retaliation, of the Procedures Manual

Section 1203, EEO/AA: Monitoring New Hires and Promotions, of the Procedures Manual

Section 1204, Monitoring Nondiscrimination and Equal Opportunity in Delivery of Employment Service and Unemployment Insurance Programs and Activities, of the Procedures Manual

Section 1205, Reasonably Accommodating Qualified Persons with Disabilities, of the Procedures Manual

Section 1206, Serving Clients with Limited English Proficiency (LEP), of the Procedures Manual

Section 1207, Reasonably Accommodating Religious Practices of IDES Employees and Prospective Employees, of the Procedures Manual

## **1201 EEO/EO COMPLAINT PROCEDURES**

### **.10 BACKGROUND**

This Section establishes procedures for processing, investigating, and mediating complaints of discrimination relating to IDES employment, programs, and activities submitted to the IDES Office of Equal Employment Opportunity/Affirmative Action by IDES employees, including job applicants, IDES clients, contractors and/or vendors or members of the general public. The procedures are designed to comply with all applicable State and Federal legal authority (see Section 1200). This Section also provides information about filing complaints of discrimination with agencies outside IDES. Additional information about complaints of discrimination is included in the IDES "[Equal Opportunity is the Law](#)" poster, which is available in English, Polish, and Spanish [or in any other language upon request](#).

**Note:** Complaints of discrimination received by IDES Employment Service staff are processed under subsection .30 below in conjunction with Section 7202 of this Manual.

The following definitions apply for purposes of this Section 1201:

**Discrimination:** (1) Unlawful discrimination as defined under applicable federal and state law and Section 1200 of this Manual; or (2) failure to provide reasonable accommodation under applicable federal and state law and Section 1205 of this Manual or any other violation of Federal or State Nondiscrimination law, rule, statute or regulation.

**Discrimination Complaint:** A complaint of *discrimination* under this Section relating to IDES employment, including but not limited to, the job application process, promotion, suspension and/or discharge, or an external complaint regarding IDES programs, services, and/or activities.

**Discrimination Complaint Process:** The procedures for handling a *discrimination complaint* established under this Section and/or the IDES Policies and Procedures, 1200 series.

**EEO/AA:** The EO Officer and EEO/AA Office as defined under Section 1200 of this Manual, as well as mediators utilized under Subsection .202 below. This also includes the definitions of an EO Officer and EEO/AA Office as defined in WIOA Nondiscrimination Regulations, seen in 29 CFR 38.

**Ethics Officer:** The individual designated by the Director of IDES to serve as the Agency's Ethics Officer pursuant to Section 20-23 of the State Officials and Employees Ethics Act.

**Complainant:** A person who alleges *discrimination* in a *discrimination complaint*.

**Respondent:** An entity or person who is alleged to be responsible for *discrimination* in a *discrimination complaint*.

### **.15 PARTICIPATION, COOPERATION, NON-RETALIATION, AND CONFIDENTIALITY**

A person or entity participates in the discrimination complaint process if they are a complainant, a respondent, or if they attend interviews or meetings, provide information or documents, or assist in other ways authorized by EEO/AA. EEO/AA may reject a Discrimination Complaint at any time if the complainant fails to participate in the discrimination complaint process as required by EEO/AA. Employees will be allowed to use paid work time as required and verified by EEO/AA to participate in the discrimination complaint process, including time for related travel.

**Note:** Employees are *not* allowed paid work time to file or otherwise participate in the processing of discrimination complaints filed with agencies outside IDES, including but not limited to the Equal Employment Opportunity Commission (EEOC), the Illinois Department of Human Rights (IDHR), and/or the USDOL, Civil Rights Center (CRC). (see subsection .50).

All IDES employees must cooperate with EEO/AA in its administration of the discrimination complaint process. An employee's duty to cooperate under this subsection does not restrict any rights or protections available to the employee under Federal and State constitutions and laws. Failure to cooperate in the discrimination complaint process may lead to discipline up to and including discharge.

Participants in the discrimination complaint process may not be subjected to unlawful retaliation (see Section 1202) because of their participation, even if a Discrimination Complaint filed in good faith is unfounded or untimely. However, participants may be disciplined up to and including discharge or termination (if employees, agents, or contractors) or sanctioned, if their participation was unreasonable and done in bad faith (see Subsection .40 below and Subsections 1200.20 and 1202.30 of this Manual).

All information, documents, records, and other materials obtained through the discrimination complaint process, including the identity of all participants, will be kept confidential to the fullest extent possible, consistent with a fair determination of the issues and in accordance with applicable State and Federal legal authority (see Section 1200). Participants must not discuss or disclose a discrimination complaint or the related discrimination complaint process, including their participation, unless authorized to do so by EEO/AA or required to do so by State or Federal legal authority.

#### **.20 DISCRIMINATION COMPLAINT PROCESSING**

A discrimination complaint is considered filed under this Section on the date it is received by EEO/AA at 115 S. LaSalle Street, 17<sup>th</sup> Floor, Chicago, Illinois 60603. The discrimination complaint, to be considered filed, shall bear the original signature of the complainant to be deemed filed. EEO/AA telephone numbers are Voice: (312) 793-9290, Fax: (312) 793-0302, TTY: (888) 340-1007.

A discrimination complaint **must** be filed in writing with EEO/AA within **300 days** of the alleged discrimination. A discrimination complaint submitted to EEO/AA by fax will be considered filed on the date the fax is received if the original signed discrimination complaint is subsequently received by EEO/AA within the 300-day period. **EEO/AA does not have jurisdiction over and will not process any discrimination complaint filed after the 300-day period has expired.** A complainant may withdraw any portion or all of a discrimination complaint at any time by submission of a written notice of withdrawal to EEO/AA.

The IDES Ethics Officer and/or any other IDES Management staff shall immediately refer to the EO Officer any complaint that is received which alleges sexual harassment.

**Note:** A complainant may file a discrimination complaint with Federal and State agencies outside IDES instead of or in addition to filing with EEO/AA (see Subsection .50 below for the names, addresses and filing deadlines of various outside agencies) or with the Ethics Officer. A complainant is *not* required to file a discrimination complaint with EEO/AA before filing one with an outside agency. The outside agency will assume jurisdiction of a discrimination complaint filed both with it and EEO/AA. In this case, EEO/AA will close the internal

discrimination complaint process file and respond to the outside complaint and/or charge. EEO/AA will notify the complainant of this action.

**Note:** IDES staff should make all reasonable efforts to advise clients and members of the general public who want to file discrimination complaints of their right to do so with EEO/AA and/or the U.S. Department of Labor, Civil Rights Center ("CRC") (see subsection .50), and should make available both the IDES External Discrimination Complaint Form (EEO-6) (Spanish) and the CRC Complaint Information Form - DL 1-2014a (Spanish), when possible.

A discrimination complaint must be filed using the appropriate, signed and fully completed IDES complaint form. IDES employees must use IDES Internal Discrimination Complaint Form (EEO-2), and IDES clients and members of the general public must use IDES External Discrimination Complaint Form (EEO-6) (Spanish). EEO/AA will reject a discrimination complaint if it is submitted orally or in a written form other than the appropriate, signed and fully completed IDES complaint form. However, EEO/AA will accept a discrimination complaint submitted in any written form if it is submitted within the 300-day period and all the following additional requirements are satisfied:

1. The written complaint must be signed by the complainant and must include:
  - a. The complainant's name and address or another means of contacting the complainant;
  - b. The identity of the respondent; and,
  - c. A description of the allegations in adequate detail for EEO/AA to determine if it has jurisdiction, including if the complaint was filed on time, and whether the allegations, if true, would establish unlawful discrimination; **and**,
2. The appropriate signed and fully completed IDES complaint form is subsequently received by EEO/AA.

IDES managers and supervisors or the Ethics Officer must immediately forward to EEO/AA any written discrimination complaint with all attached documents in any form received by them or their staff. IDES managers shall refer to EEO/AA Office any complaints, whether written or oral, made by their staff that allege EEO/AA violations, including but not limited to, unequal treatment, hostile working environments and discrimination.

When EEO/AA receives a discrimination complaint it will issue a written statement to the complainant acknowledging receipt and notifying the complainant of the right to representation during the discrimination complaint process when possible (see Subsection .203 below).

When possible, EEO/AA will conduct a preliminary review of the discrimination complaint to determine whether: (1) EEO/AA has jurisdiction, including if it was filed on time; (2) it provides adequate detail to determine the identity of the complainant and Respondent(s); and (3) the allegations, if true, would establish Discrimination. EEO/AA may require the complainant to provide additional information or documentation.

If EEO/AA determines it does not have jurisdiction over all or any part of the discrimination complaint, EEO/AA should promptly, when possible, issue a written Notice of Lack of Jurisdiction to the complainant stating the reasons for the determination and notifying the complainant of the right to file a complaint with CRC within **30 days** of the date the Notice was received.

If EEO/AA determines it does have jurisdiction over all or any part of the discrimination complaint, EEO/AA should, when possible, issue a written statement to the complainant including a list of the issues raised in the discrimination complaint and for each issue a statement whether EEO/AA will accept the issue for investigation or reject the issue, and the reasons for each rejection. The statement of issues should also notify the complainant of the right to elect a customary investigation under Subsection .201 below or alternative dispute resolution ("ADR") under Subsection .202 below as the method of investigation. This choice rests with the complainant and is binding once it is made; the complainant cannot choose one process and later switch to the other.

EEO/AA should use its best efforts to issue a written Notice of Final Action to the complainant within **90 days** of the date the discrimination complaint was filed, regardless of the choice of a Customary Investigation or ADR. The Notice of Final Action should include:

- For each issue raised in the discrimination complaint that was accepted by EEO/AA, a statement of either EEO/AA's decision on the issue and an explanation of the reasons for the decision, or a description of the way the parties resolved the issue; and
- A notice that the complainant has the right to file a complaint with CRC within **30 days** of the date on which they received the Notice of Final Action if they are dissatisfied with the final action.

If EEO/AA fails to issue a Notice of Final Action within 90 days of the date the discrimination complaint was filed, the complainant has the right to file a complaint with CRC within **30 days** of the expiration of the 90-day period, i.e., within **120 days** of the date the discrimination complaint was filed.

*CRC Appeal Example 1.* An employee files a discrimination complaint with EEO/AA on June 1. The 90<sup>th</sup> day from the date of filing is August 29. The employee receives a Notice of Final Action on July 17. A complaint with CRC must be filed by August 15 (30 days from the date the Notice of Final Action was received).

*CRC Appeal Example 2.* The same facts as above, except that a Notice of Final Action is not issued by August 29. A complaint with CRC must be filed by September 27 (30 days from the expiration of the 90-day period; 120 days from the date the discrimination complaint was filed).

*CRC Appeal Example 3.* The same facts as above, except that a Notice of Final Action is issued on September 25. A complaint with CRC still must be filed by September 27 (30 days from the expiration of the 90-day period; 120 days from the date the discrimination complaint was filed).

***The EO Officer will conduct an initial review of a sexual harassment complaint within 10 business days of receipt of the complaint, or as soon as possible thereafter. If the EO Officer determines that a further investigation is warranted, the EO Officer shall complete the investigation within 30 days of receipt of the complaint, or as soon as possible thereafter.***

**.201 Customary Investigation**

A Customary Investigation may be conducted by means such as interviews of the parties and witnesses, review of pertinent documents, meetings between EEO/AA and various parties, and other methods adopted by EEO/AA as guided by State and

Federal legal authority. The scope of a Customary Investigation will be limited to the issues raised in the discrimination complaint that were accepted by EEO/AA. The objective of a Customary Investigation is to determine if there is substantial evidence to support any of the Discrimination allegations in the discrimination complaint that were accepted by EEO/AA.

If substantial evidence is found, EEO/AA will attempt to resolve the issues to the extent feasible and reasonable under the circumstances by holding informal negotiations with the interested parties, either separately or in any combination. Any resolution reached by the parties will be processed as an agreement reached under subsection .202.

All findings of substantial evidence and thereafter recommendations made by the EO Office, pursuant to its investigation, shall be sent to Labor Relations and the appropriate managerial authority to effectuate.

**.202 Alternative Dispute Resolution (ADR)**

The form of ADR available to a complainant is mediation. In mediation, a neutral mediator conducts necessary fact-finding and meets with the parties and others in an attempt to guide the parties to a resolution of the issues raised in the discrimination complaint that were accepted by EEO/AA. The mediator will prepare a written agreement setting out the terms and conditions of any resolution reached by the parties. A party who believes an agreement reached under this subsection has been breached may file a complaint with CRC within **30 days** of the date the party learned of the alleged breach.

**.203 Right to Accompaniment, Advice, and Representation**

Under the Illinois Human Rights Act (IHRA) and Federal regulations, an IDES employee who is a complainant or the subject of the proceeding may be accompanied, advised and represented in any meeting, conference, or other proceeding in the discrimination complaint process by an attorney licensed to practice law in Illinois or a representative of an employee organization whose membership is composed of employees of the State and of which the employee is a member. The IHRA provides that a representative other than an attorney may observe **but may not actively participate or advise the employee** during the course of the proceeding and provides that the right to representation shall not be construed to permit any person not licensed to practice law in Illinois to deliver any legal services or engage in any activities that would constitute the unauthorized practice of law.

**Note:** A collective bargaining agreement may provide additional or different rights to bargaining unit employees than those provided under this subsection.

The IHRA also requires that any representative of an IDES employee, including an attorney, may not use or reveal any information obtained during the course of a proceeding in the discrimination complaint process either during or after termination of the representation relationship without the consent of the complainant and any State employee who is the subject of the proceeding and pursuant to governing confidentiality rules and regulations. Intentional or reckless disclosure of information in violation of this duty constitutes a Class B misdemeanor.

IDES is not responsible for any fees or costs, including attorney's fees, incurred by or on behalf of an IDES employee as a result of any accompaniment, advice, or representation under this subsection.

**.30 EMPLOYMENT SERVICE DISCRIMINATION COMPLAINTS**

Under Section 7202 of this Manual, Employment Service Complaint System, a complaint of discrimination relating to the Employment Service on the basis of race, color, religion, national origin, sex, age, or disability received by IDES Employment Service personnel is designated an ESR-EO Complaint. All ESR-EO Complaints must be forwarded to EEO/AA for handling in accordance with Section 7202. An ESR-EO Complaint against an employer shall be referred to the Equal Employment Opportunity Commission and/or the Illinois Department of Human Rights. An ESR-EO Complaint relating to Employment Service actions or omissions under federal regulations shall be processed as a discrimination complaint filed under this Section, except that it is also subject to the appeal and hearing provisions provided under Subsection 7202.424.

**.40 FALSE AND FRIVOLOUS COMPLAINTS**

A false and frivolous discrimination complaint is a discrimination complaint that is unreasonable and filed in bad faith. A person may be disciplined up to and including discharge or termination (if an employee, agent, or contractor) or sanctioned (if a client or member of the general public) for filing a false and frivolous complaint (see Subsections 1200.20 and 1202.30 of this Manual).

**Note:** A false and frivolous complaint is **not** a reasonable discrimination complaint filed in good faith that cannot be proved.

**.50 RESOLUTION OUTSIDE IDES**

A complainant may file a complaint or charge with an outside federal or state agency instead of, filing a discrimination complaint with EEO/AA. A complainant is **not** required to file a discrimination complaint with EEO/AA before filing a complaint or charge with an outside agency. A list of various outside Federal and State agencies and their filing time frames is provided below.

**Note:** Filing a discrimination complaint with EEO/AA does **not** toll the time frame within which a complaint or charge must be filed with an outside agency, even if a discrimination complaint is pending with EEO/AA. Complainants are responsible for ensuring that their outside filings are within the pertaining time frames.

**Illinois Department of Human Rights (IDHR):**

555 West Monroe Street, 7th Floor  
Attn. Intake Unit  
Chicago, Illinois 60661  
(312) 814-6200  
TTY: (866) 740-3953  
FAX: (312) 814-6251 (Charge Process)  
Email: [IDHR.Intake@illinois.gov](mailto:IDHR.Intake@illinois.gov)

**Or**

524 S. 2nd Street, Third Floor  
Attn. Intake Unit  
Springfield, Illinois 62701  
(217) 785-5100

TTY: (866) 740-3953  
FAX: 217-785-5106 (Charge Process)  
Email: [IDHR.Intake@illinois.gov](mailto:IDHR.Intake@illinois.gov)

IDHR requires the complaint to be filed within 300 days of the alleged discrimination.

**U.S. Equal Employment Opportunity Commission (EEOC)**

230 South Dearborn, Suite 1866  
Chicago, Illinois 60604  
Phone: 1-800-669-4000  
TTY: 1-844-234-5122  
EEOC Public Portal

EEOC requires the complaint to be filed within 300 days of the alleged discrimination.

**Director, Civil Rights Center (CRC)**

U.S. Department of Labor  
200 Constitution Avenue N.W., Rm. N-4123  
Washington, D.C. 20210  
Voice: (202) 693-6500  
Fax: (202) 693-6505,  
Relay Services: 711

CRC requires filing within 180 days of the alleged discrimination, unless a discrimination complaint is filed with EEO/AA, in which case a discrimination complaint may be filed with CRC either within 30 days of the date a Notice of Final Action is received or, if a Notice of Final Action is not issued within 90 days of the date the discrimination complaint was filed, within 30 days of the 90th day, i.e., within 120 days of the date the discrimination complaint was filed.

The Illinois Department of Human Rights maintains the state sexual harassment and discrimination [website](#) and hotline: 1-877-236-7703 (Monday – Friday 8:30 a.m. to 5:00 p.m.).

**.60 REFERENCES**

Section 188 of the Workforce Innovation and Opportunity Act of 2014 (29 USC 2938)

Section 20-23 of the State Officials and Employees Ethics Act (5 ILCS 430/20-23)

The Illinois Human Rights Act of 1980 (775 ILCS 5/)

Part 32 of the regulations of the U.S. Department of Labor (29 CFR Part 32)

Part 38 of the regulations of the U.S. Department of Labor (29 CFR Part 38)

Regulations of the U.S. Equal Opportunity Commission (29 CFR Parts 1600 - 1699)

Regulations of the Department of Human Rights and the Human Rights Commission (56 Ill. Adm. Code Parts 2500 - 2540)

Executive Order 2018-02

Section 1200, Unlawful Discrimination; Reasonable Accommodation; Equal Employment Opportunity/Affirmative Action: Statement of Policy, of the Procedures Manual

Section 1202, Unlawful Harassment and Unlawful Retaliation, of the Procedures Manual

Section 1205, Reasonably Accommodating Qualified Persons with Disabilities, of the Procedures Manual

Section 5001, IBIS Claims Taking Process, of the Procedures Manual

Section 7202, Employment Service Complaint System, of the Procedures Manual

## **1202 UNLAWFUL HARASSMENT AND UNLAWFUL RETALIATION**

### **.10 POLICY**

In accordance with Section 1200 of this Manual, it is IDES policy to fully comply with all Federal and State legal authority that requires IDES to maintain work, program, and activity environments free of unlawful harassment and unlawful retaliation, which are forms of unlawful discrimination. An IDES employee, agent, or contractor who engages in unlawful harassment or unlawful retaliation may be subject to discipline, up to and including discharge or termination. A person who harasses or threatens another may also be subject to criminal charges.

IDES managers and supervisors must report ***all*** complaints, allegations, and perceived incidents of unlawful harassment and unlawful retaliation to the Department's EO Officer (see subsection 1200.30 of this Manual) or the Ethics Officer. These complaints, allegations, and incidents must be reported even if the targeted person does not wish to make a formal complaint. The EO Officer is available to consult about unlawful harassment and unlawful retaliation issues; Voice: (312) 793-9290, Fax: (312) 793-0302, TTY: (888) 340-1007.

This Section focuses on unlawful harassment and unlawful retaliation in connection with IDES employment, although unlawful harassment and unlawful retaliation in connection with IDES programs and activities are also prohibited.

The IDES Ethics Officer shall immediately refer to the EO Officer any complaint that the Ethics Officer receives, and which alleges sexual harassment.

### **.20 UNLAWFUL HARASSMENT**

Unlawful harassment occurs when a person is harassed on the basis of a lawfully protected personal characteristic such as race, color, religion, sex, national origin, citizenship, age, disability, political affiliation or belief, unfavorable (except a dishonorable) discharge from military service, military status, ancestry, marital status, sexual orientation, or genetic information or any other protected category recognized by Federal/State law, rules, and/or statutes.

Unlawful harassment in employment generally results when, on an objective basis, harassment based on an employee's lawfully protected personal characteristic substantially interferes with the employee's work performance or creates an intimidating, hostile or offensive working environment. This form of harassment is known as a *hostile work environment*. (Sexual harassment includes additional forms of harassing conduct. See subsection .201 below). Courts have held that a hostile work environment exists when an employee's workplace is permeated with discriminatory intimidation, ridicule, and insult that on an objective basis are sufficiently severe or pervasive to alter the employee's conditions of employment. The Equal Employment Opportunity Commission (EEOC) offers a partial list of the kinds of harassing conduct that may contribute to a hostile work environment, e.g.:

- offensive jokes
- slurs
- epithets or name calling
- physical assaults or threats
- intimidation
- ridicule or mockery
- insults or put-downs
- offensive objects or pictures
- interference with work performance

Unlawful harassment of an IDES client may result from the same form of hostile environment (i.e., when, on an objective basis, harassment based on a client's lawfully protected personal characteristic substantially interferes with the client's use or enjoyment of an IDES program or activity or creates an intimidating, hostile or offensive IDES program or activity environment).

**.201 Sexual Harassment**

Sexual harassment is a unique subset of unlawful harassment prohibited by both the IHRA and Title VII. An IDES employee, agent, or contractor who engages in sexual harassment not only may be disciplined and/or sanctioned by the Department, but under the IHRA may also be held personally liable for civil penalties and damages (see subsection .10 above regarding criminal charges).

The IHRA defines sexual harassment in employment as: Any unwelcome sexual advances or requests for sexual favors or any conduct of a sexual nature when:

- Submission to such conduct is made either explicitly or implicitly a term or condition of a person's employment;
- Submission to or rejection of such conduct by a person is used as the basis for employment decisions affecting such person; or
- Such conduct has the purpose or effect of substantially interfering with a person's work performance or creating an intimidating, hostile, or offensive working environment.

The definition of sexual harassment under Title VII is similar. Sexual harassment affects both sexes. Sexual harassment involves a man's harassment of a woman, a woman's harassment of a man and harassment between members of the same sex.

Examples of sexual harassment include employment actions under which:

- An employee is denied employment opportunities by a supervisor after rejecting the supervisor's sexual advance(s) or request(s) for sexual favors; and
- An employee is subjected to severe or pervasive conduct by co-workers because of their sex that substantially interferes with the employee's job performance.

Unwanted conduct that, if sufficiently severe or pervasive, may constitute sexual harassment includes but is not limited to:

- *Verbal:* Sexual innuendos and suggestive comments; sexual insults and threats; sexual humor such as jokes about sex, anatomy or sex-specific traits; sexual propositions and requests for dates, especially when repeated; and statements of a sexual nature about other persons, even when made outside of their presence.
- *Non-Verbal:* Sexually suggestive or insulting sounds such as whistling, catcalls, and "smacking" or kissing noises; leering; obscene gestures; and sexually suggestive bodily gestures.

- *Graphic*: Posters; *signs*; pin-ups; and pictures of a sexual nature.
- *Physical*: *Touching*, hugging or kissing, pinching, brushing the body, unwanted sexual acts, and sexual attacks.
- *Electronic*: E-mail, text/picture messages (sexting), Internet (e.g., on-line postings, blogs, instant messages, social networks, etc.), and cyber stalking.

While the most commonly recognized forms of sexual harassment often involve the types of conduct described above, non-sexual conduct can also constitute sexual harassment when that conduct is directed at the individual(s) because of their sex. For example, a court found sexual harassment based on a hostile work environment when a female employee reported to work every day and found their tools stolen, their workstation filled with trash, and their equipment disabled by male co-workers because they resented working with a woman.

The most severe and overt forms of sexual harassment are the easiest to recognize. On the other end of the spectrum, sexual harassment may involve conduct that a person does without an intent to sexually harass another. For example, phrases such as "honey," "darling," and "sweetheart" may seem innocent to the speaker but may be unwanted by many employees who believe they are offensive, condescending, and damaging to their ability to perform their jobs professionally. As another example, what is meant as a compliment may be perceived as an unwanted sexual remark. The following three statements might be meant as compliments about the appearance of a coworker:

- "That's an attractive dress you have on."
- "That's an attractive dress. It really looks good on you."
- "That's an attractive dress. You really fill it out well."

The first statement may often be perceived as an inoffensive compliment; the second statement may be perceived less so; and the third statement is the most likely one to be perceived as unwanted sexual comment. Every IDES employee must be aware that what may seem to them to be harmless or playful may in fact be unwanted sexual conduct. To avoid the possibility of sexual harassment charges, it is best to follow a course of conduct and speech that are sexually neutral and contain no sexual innuendo.

It would be appropriate for an employee to respond to what is perceived as sexual harassment targeted at them by directly and clearly expressing their objection to the unwelcome conduct to the harassing person(s) and ask that it stop. The message may be oral, but if the unwelcome conduct continues the employee may want to give the harassing person(s) subsequent messages in writing in a note or a memo. Other actions the employee may take are addressed in subsection .40 below.

### **.30 UNLAWFUL RETALIATION**

Unlawful retaliation occurs when a person is subjected to retaliation for:

- Opposing what the person believes to be unlawful discrimination;

- Making a charge, filing a complaint, or testifying, assisting, or participating in an investigation, proceeding, or hearing regarding what the person believes to involve unlawful discrimination; or
- Requesting, attempting to request, using, or attempting to use a reasonable accommodation.

(See Section 1200 of this Manual for the definition of *unlawful discrimination* and Section 1205 for definitions of *reasonable accommodation*).

A person may not be subjected to any act of retaliation of any type because of the person's opposition, participation, or request as identified above. Retaliation is prohibited even when a person's opposition, participation, or request is ultimately rejected, denied, or unfounded. However, a person may be disciplined up to and including discharge or termination (if an employee, agent, or contractor) or sanctioned (if a client or member of the public) if their opposition, participation, or request was unreasonable and done in bad faith. (See subsections 1200.20 and 1201.40 of this Manual.)

**.40 RESPONDING TO UNLAWFUL HARASSMENT AND RETALIATION**

People who either observe or believe they are the target of unlawful harassment or unlawful retaliation should deal with the incident(s) as directly and firmly as possible by clearly communicating their position to the offending person(s) and reporting the conduct to their supervisor, the Ethics Officer and the EO Officer. If the harassing or retaliating person is an employee's supervisor, the employee may report the conduct to the next level of supervision, the Ethics Officer and the EO Officer. A person may report unlawful harassment or unlawful retaliation even if the offending conduct is not directed at that person. A person may want to document each incident (what was said or done, by whom, the date, time, place, persons present, etc.). Documentation can be strengthened by records such as letters, notes, memos, and telephone messages.

A person may also file a formal complaint of unlawful harassment or unlawful retaliation with the EEO/AA Office, the Ethics Officer or an outside agency. (See Section 1201 of this Manual.)

The Illinois Department of Human Rights also administers the State of Illinois Sexual Harassment Hotline:

- Hotline: 1-877-236-7703 (Monday – Friday 8:30 a.m. to 5:00 p.m.)
- Website: [www.illinois.gov/sexualharassment](http://www.illinois.gov/sexualharassment)

**.50 REFERENCES**

Title VII of the Civil Rights Act of 1964 (42 USC 2000e)

Section 188 of the Workforce Innovation and Opportunity Act of 2014 (29 USC 2938)

Part 32 of the regulations of the U.S. Department of Labor (29 CFR Part 32)

Part 38 of the regulations of the U.S. Department of Labor (29 CFR Part 38)

Regulations of the U.S. Equal Opportunity Commission (29 CFR Parts 1600 - 1699)

The Illinois Human Rights Act of 1980 (775 ILCS Act 5)

Executive Order 2018-02

Section 1200, Unlawful Discrimination; Reasonable Accommodation; Equal Employment Opportunity/Affirmative Action: Statement of Policy, of the Procedures Manual

Section 1201, EEO/EO Complaint Procedures, of the Procedures Manual

Section 1205, Reasonably Accommodating Qualified Persons with Disabilities, of the Procedures Manual

## 1203 EEO/AA: MONITORING NEW HIRES AND PROMOTIONS

### .10 BACKGROUND

Through its rulemaking powers contained in Sections 7-101(A) and 7-105(A) of the Illinois Human Rights Act (IHRA), the Department of Human Rights (DHR) mandates that each state agency shall implement a process to monitor its hiring and promotional transactions. **Note:** Because of various reporting requirements of the Department of Central Management Services and the Department of Human Rights, "hiring" as used herein also includes both intra- and inter-agency transfers **and** the conversion of intermittent employees to full-time positions. The purpose of monitoring is to ensure the Department's compliance with its Equal Employment Opportunity/Affirmative Action Plan and to evaluate progress toward meeting the Plan's goals.

Section 2520.770 (h) of the DHR rules provides:

The Hiring Monitor (DHR-19) and the Promotion Monitor (DHR-20) established by the Department shall be completed by each agency and submitted as required to Central Management Services on all hires and promotions for all full-time permanent and part-time permanent employees, including trainees, provisional employees, and semi-automatic promotions pursuant to a collective bargaining agreement. On the applicable Monitor, the agency shall indicate the EEO job category and classifications of the position and whether it is an underutilized category. The Monitor shall also indicate the race, sex, whether disabled, and national origin of all persons considered for the position and of the candidate, and whether the candidate meets the affirmative action requirements for that category. If the candidate does not meet the affirmative action requirements for that category, a detailed explanation indicating the reasons for the selection must be completed by the selecting officer and attached to the Monitor. The agency EEO Officer, or designee, shall have access to the eligibility list and other pertinent documents, including, but not limited to, Rutan documentation. The agency EEO Officer, or designee, shall review and sign the Monitor, indicating concurrence or non-concurrence in the transaction. The EEO Officer or designee shall fully explain on the Monitor their reason for any non-concurrence. In all transactions, the agency Chief Executive Officer or designee shall sign and date the Monitor, indicating approval. Central Management Services **shall not complete** any hire or promotion transaction if the Monitor is not attached to the transaction, is not signed and dated by the EEO Officer or designee, is not approved and signed by the agency's Chief Executive Officer or designee and is not signed and dated prior to the effective date of the candidate's hire or promotion. (Emphasis added)

The following procedures describe the process of monitoring new hires and promotions to ensure compliance with the above-cited procedure and the Department's Equal Employment Opportunity/Affirmative Action Plan.

### .20 PROCEDURES FOR MONITORING NEW HIRES AND PROMOTIONS

#### Section or Bureau Manager or Designee

- Once a decision is made to seek approval to fill a vacancy, completes an [e-PAR \(Personnel Action Request\)](#) and submits to Human Resource Management (HRM).

**Human Resource Management Recruitment/Selection Staff**

2. Once the e-PAR is approved, sends an email to EEO requesting a hiring or promotion Monitor, and provides a copy of all recruitment announcements (i.e., posting notice), if any, to the EO Officer **prior to posting**. (Includes any outreach recruitment documentation.) If no recruitment announcement is posted (e.g., for vacancies subject to the Permanent Bid System), provides EEO with a copy of the selection list.

**Equal Opportunity Officer or Designee**

3. When a request for a monitor is received, determines the EEO job category and checks the current status of underutilization for the requested category in the DHR region of the work location where the position will function. This will be accomplished within five days, when possible.
4. After step 3 is completed, prepares the appropriate portion of the Monitor form indicating The posting and tracking numbers (if available), position title and location, and EEO category for the requested position, as well as the status of underutilization based on the current Affirmative Action Plan and/or quarterly report.

**Note:** If there *is* underutilization of African Americans, Hispanics, Asians, Native Americans/Alaskans, Pacific Islanders, persons with disabilities and/or women in the affected EEO job category in the DHR region of the work location where the position will function, the Monitor will indicate the underutilized group(s) and the number by which the specific category/categories is/are underutilized.

5. Sends copies of the Monitor form to HRM selection/recruitment staff for each vacancy to be filled.

**Human Resource Management Recruitment/Selection Staff**

6. After a tentative selection is made, but **prior to** informing the candidate of their selection, submits the selection packet, which includes the Monitor form, to EEO.

**Equal Opportunity Officer or Designee**

7. Reviews the Monitor and selection packet to determine whether selected candidate assists the Department in meeting its affirmative action goals. If so, signs the Monitor "concurring" with the hire and returns it to HRM to proceed with the selection.
8. If the selection of a candidate does **not** assist the Department in meeting its affirmative action goals, may circle "not concur" on the Monitor form. However, if the reason stated for not meeting the Department's affirmative action goals is **acceptable**, signs the Monitor and forwards it to HRM. If the reason stated in the Monitor is **unacceptable**, notes reason for not concurring with the hire and returns the Monitor to HRM.

**Human Resource Management Recruitment/Selection Staff**

9. After the Monitor has been signed by the EEO Officer or designee, notifies the candidate of the starting date. **Note:** The candidate shall not be notified of a starting date until the Monitor is signed.

**.30 REFERENCES**

[Sections 7-101\(A\) and 7-105\(A\) of the Illinois Human Rights Act \(775 ILCS 5/7-101\(A\) and 5/7-105\(A\)\)](#)

[Section 2520.770\(h\) of the rules of the Department of Human Rights \(56 Ill. Adm. Code 2520.770\(h\)\)](#)

[Part 38 of the regulations of the U.S. Department of Labor \(29 CFR Part 38\)](#)

**1204 MONITORING NONDISCRIMINATION AND EQUAL OPPORTUNITY IN DELIVERY OF EMPLOYMENT SERVICE AND UNEMPLOYMENT INSURANCE PROGRAMS AND ACTIVITIES**

**.10 BACKGROUND**

The nondiscrimination and equal opportunity requirements of Section 188 of the Workforce Innovation and Opportunity Act of 2014 (WIOA) and Civil Rights Center, U.S. Department of Labor (CRC) regulations require the Department of Employment Security to conduct annual monitoring of compliance with nondiscrimination in the delivery of Employment Service and Unemployment Insurance programs and activities. This Section 1204 describes the process of monitoring the Department's compliance with these requirements, including review schedules and targeting criteria. Under CRC regulations, the WIOA nondiscrimination equal opportunity requirements include the unlawful discrimination, reasonable accommodation, equal opportunity and affirmative action requirements of Federal and State legal authority identified under Section 1200 of this Manual.

The current plan for compliance monitoring of IDES is to continuously monitor all Local Offices and all services, benefits, and programs provided in the areas of Employment Services and Unemployment Insurance. Compliance reviews are conducted, when possible, on an annual basis, according to a fixed, predetermined schedule or timetable.

Compliance reviews consist of statistical examinations of services provided (e.g., adjudication, claims taking, job referrals, placements, etc.) to discrete applicant groups (e.g., age, sex, ethnicity, and disability status) as well as on-site visits and/or desk review audits by an Equal Opportunity (EO) Compliance Monitor from the EEO/AA Office. The EO Compliance Monitor uses the Equal Employment Opportunity Compliance Review Guide when conducting on-site and/or desk review audits.

**.20 EMPLOYMENT SERVICE COMPONENT**

The Equal Opportunity data requirements for Employment Service are found in Employment Service Program Letter No. 14-89, dated May 4, 1989. To this end, the Department contracts with America's JobLink Alliance to produce the Illinois JobLink (IJL) Reports, a computer system, i.e., Tableau, which produces statistical reports that measure service delivery to discrete applicant groups.

After the IJL statistical reports are analyzed and other reports, such as the UI/ES complaint logs (See Sections 1201, and 7202 of this Manual.) are reviewed, the EO Officer may identify Local Offices with a pattern of complaints and/or whose Employment Service statistical measures deviate from the norm with respect to such functions as job referrals and job placements when practicable.

Additionally, the IJL system enables the EO Officer to generate and produce reports of particular offices if they are requested by the CRC.

**.30 UNEMPLOYMENT INSURANCE PROGRAM COMPONENT**

The Equal Opportunity data collection requirements for Unemployment Insurance are set forth in Unemployment Insurance Program Letters Nos. 46-89 and 46-89, Change 1, dated May 4, 1989, and August 21, 1990, respectively. The program letters set forth the guidelines and regulations that the Department must follow in collecting (during the initial claims taking) and maintaining the data.

Review of the Unemployment Insurance program includes, but is not limited to, the number of claims processed, monetary and nonmonetary determinations, separation and non-separation issues, and appeals. The Unemployment Insurance Program Letters specify that no routine reporting of compliance reviews are required as data are submitted to CRC upon request. CRC may provide the Department prior notice before scheduling an on-site compliance review by requesting data for selected IDES Local Offices in advance.

**.40 UNEMPLOYMENT INSURANCE APPEALS COMPONENT**

UI Program Letter No. 46-89 requires the Department to collect UI data to detect any discriminatory practices in the delivery of UI services, including appeals. Unemployment Insurance appeals data are analyzed on a quarterly basis. Both lower and higher authority level appeals are analyzed to detect if discriminatory conduct might be occurring with regard to various racial, ethnic, gender, age, and disability populations.

The process of analyzing the total number of lower authority appeals involves reviewing decisions involving separations on such factors as voluntarily leaves and discharges for misconduct. Non-separation issues such as able and available, disqualifying income, refusal of suitable work, reporting requirements, and other issues are also reviewed. Allow rates (i.e., decisions in favor of claimants) and denial rates (i.e., decisions not in favor of claimants) are examined to discern if any significant population differences are present.

Pursuant to UI Program Letter No. 46-89, data collection for appeals is required for EEO monitoring. For lower authority appeals, only separation decisions are monitored (voluntary leave, discharge, and other separation). For higher authority appeals, only decisions allowed and denied by applicant characteristics are monitored.

The appeals data are currently maintained in IBIS along with applicant characteristics (race/ethnic, age, gender, and disability). This data is used to produce the following two types of tables which will be reviewed for single claimant appeals.

**.401 Lower Authority**

1. Total number of lower authority appeals decisions made by the following:
  - a. Separation Issues: voluntary quits; discharges for misconduct; and others.
  - b. Non-Separation Issues: able and available and actively seeking work; disqualifying or deductible income; refusal of suitable work; reporting requirements; and others.
2. Total number of appeal decisions in favor of claimants.
3. Total number of appeal decisions not in favor of claimants.

**.402 Higher Authority**

1. Total number of higher authority appeal decisions made.
2. Total number of appeal decisions in favor of claimants.
3. Total number of appeal decisions not in favor of claimants.

**.50 ON-SITE REVIEWS OF LOCAL OFFICES**

The EO Compliance Monitor's on-site visits and/or desk review audits to IDES offices include, but are not limited to observing intake and referral processes; interviewing Local Office staff; and determining the offices' compliance with equal opportunity/equal employment opportunity directives, such as posting of required notices, etc. On-site and/or desk review audit visits to IDES Local Offices shall also be conducted to comply with requests from CRC for specific data on designated offices.

Additionally, it must be demonstrated that such compliance reviews are occurring and are ongoing. Such documentation must be kept on file in the event that it is requested by CRC. (See Section 1103 of this Manual for applicable retention periods.)

**.60 REPORT AND CORRECTIVE ACTION PLAN**

After completion of an on-site and/or desk audit review, the EO Officer prepares a written summary of the conclusions and recommendations. A draft report is then submitted to the Local Office manager and appropriate upper-level managers, including the Deputy Director, for their response and development of any needed corrective action plan. The corrective action plan should specify steps, responsible person(s), and due dates.

**.70 REFERENCES**

Section 188 of the Workforce Innovation and Opportunity Act of 2014 (29 USC 2938)

Part 32 of the regulations of the U.S. Department of Labor (29 CFR Part 32)

Part 38 of the regulations of the U.S. Department of Labor (29 CFR Part 38)

Employment Service Program Letter No. 14-89, dated May 4, 1989

Unemployment Insurance Program Letter No. 46-89, dated August 16, 1989

Unemployment Insurance Program Letter No. 46-89, Change 1, dated August 21, 1990

Equal Employment Opportunity Compliance Review Guide

Section 1103, Retention and Disposal of IDES Records, of the Procedures Manual

Section 1200, Unlawful Discrimination; Reasonable Accommodation; Equal Employment Opportunity/Affirmative Action Program: Statement of Policy, of the Procedures Manual

Section 1201, EEO/EO Complaint Procedures, of the Procedures Manual

Section 1205, Reasonably Accommodating Qualified Persons with Disabilities, of the Procedures Manual

Section 7202, Employment Service Complaint System, of the Procedures Manual

## **1205 ACCOMMODATING INDIVIDUALS WITH DISABILITIES**

### **.10 PURPOSE**

To provide policies and procedures for providing reasonable accommodation to the known disabilities of qualified IDES employees, job applicants, and clients.

### **.20 POLICY STATEMENT OF REASONABLE ACCOMMODATION**

It is the policy of the Illinois Department of Employment Security to comply with, among other State and Federal laws, the Americans with Disabilities Act of 1990 (Titles I and II) (ADA), Americans with Disabilities Act Amendments Act of 2008, Environmental Barriers Act, Illinois Accessibility Code, Guide Dog Access Act, Illinois Information Technology Access Act, Section 504 of the Rehabilitation Act of 1973 (Section 504), and the Illinois Human Rights Act (IHRA). IDES provides or allows reasonable accommodation upon request to the known disabilities of qualified IDES employees, job applicants, and clients unless a reasonable accommodation will impose an undue hardship on IDES operations. An individual must request reasonable accommodation and establish they have a qualifying physical or mental disability. Then, if a reasonable accommodation will not impose an undue hardship, IDES provides or allows a reasonable accommodation that will enable a qualified employee with a disability to perform the essential functions of their job, a qualified job applicant with a disability to participate in the hiring process, or a qualified client with a disability to participate in and enjoy the benefits of IDES programs, services, and activities.

A qualified individual with a disability may request a specific reasonable accommodation. The specific request will be considered, but the reasonable accommodation that is provided and/or allowed to the individual will be determined by the Department in its discretion. A qualified individual with a disability is not required to accept a particular reasonable accommodation, but rejection of a reasonable accommodation may jeopardize the individual's status as a qualified individual with a disability. A request for reasonable accommodation may be denied if the individual who requested the accommodation poses a direct threat to the health or safety of the individual or others. See subsection .50. A reasonable accommodation may be rescinded by the Department if it later proves to pose an undue hardship or a direct threat to the health or safety of the individual who requested accommodation or others, or if the accommodated individual no longer is a qualified individual with a disability or requires the accommodation.

Inquiries regarding this policy or requests for copies of the reasonable accommodation policy or processing procedures must be directed to the Equal Opportunity Officer, Office of Equal Employment Opportunity/Affirmative Action, 115 South La Salle Street, 17th Floor, Chicago, Illinois 60603-2802, Voice 312-793-9290 /TTY 888-340-1007 /Fax 312-793-0302. Employees may also find relevant policies and procedures posted on its intranet site. (See subsections .30 through .70).

### **.201 Definitions of Terms**

The definitions of terms provided in the ADA include the following:

*Direct Threat* is a significant risk of substantial harm to the health or safety of the individual requesting accommodation or others that cannot be eliminated or reduced by reasonable accommodation.

*Disability* is a physical or mental impairment that substantially limits one or more of the major life activities of an individual, a record of such impairment, or being regarded as having such an impairment.

*Essential Job Functions* are the fundamental job duties of a job and do not include the marginal functions of a job.

*Qualified Individual with a Disability* is any individual with a disability who with or without reasonable accommodation can perform the essential functions of the job the individual holds or desires or meets the essential eligibility requirements for receiving services or participating in programs or activities of a public entity.

*Undue Hardship* is an action requiring a significant difficulty or expense when considered considering such factors, including but not limited to, the nature and cost of the accommodation, the overall financial resources of the entity involved, the size of the entity, and the type of operations of the entity.

**.202 Methods of Reasonable Accommodation**

The following are some examples of methods that may be used to reasonably accommodate the disabilities of qualified individuals.

- Making existing facilities readily accessible to and usable by qualified individuals with disabilities
- The acquisition or modification of equipment or devices, appropriate adjustment of examinations, training materials, or policies, and the provision of qualified readers or interpreters.
- Modifications or adjustments to policies and procedures that enable a qualified individual with a disability to enjoy equal access to, participation in and the benefits and privileges of the jobs, hiring processes and programs, services, and activities of an entity.

**.203 Designation of ADA Liaison**

Each cost center manager designates a staff person as the ADA liaison, when possible. The ADA liaison assists qualified individuals with disabilities with filing requests for reasonable accommodation and complaints of discrimination based on their disabilities, including denials of requests for reasonable accommodation.

**.30 PROCEDURES FOR PROVIDING REASONABLE ACCOMMODATIONS**

**.301 Accommodating Employees with Disabilities**

Qualified IDES employees with disabilities desiring accommodation shall request reasonable accommodation by completing [Form EEO-5, Request for Reasonable Accommodation](#), and [Form EEO-7, Physician's Medical Review for Reasonable Accommodation Request](#). The forms shall be submitted through proper channels to the EO Office for decision.

The original forms EEO-5 and EEO-7 shall be sent to: Equal Opportunity/Equal Employment Opportunity Officer, IDES Office of Equal Employment/Affirmative Action, 115 S. La Salle Street, 17th Floor, Chicago, Illinois 60603-2802.

All requests for reasonable accommodation must be submitted to the EO Officer whether or not they require an expenditure of funds. The EO Officer shall review the request and make every reasonable effort to respond to the employee within 10 working days from the date the request is received by the EO Officer, when possible. The EO Officer may require the submission of medical documentation to support the need for reasonable accommodation. The EO Officer may require an employee to undergo independent medical evaluation at IDES expense. All medical documents shall be maintained in a confidential EEO file.

EEO will consult with appropriate parties, individually or jointly, when making a determination regarding an accommodation. The appropriate parties may include, but are not necessarily limited to, management, Labor/Management Relations (LMR), Human Resource Management, collective bargaining unit representatives, Job Accommodation Network (JAN), Illinois Interagency Committee on Employees with Disabilities, and other State and Federal resources. Personal and medical information shall be treated as confidential and will be shared only on a need-to-know basis.

After all necessary documentation has been submitted, the EEO Office will review the request and make a final decision. A written decision shall be issued to the requesting employee. If the accommodation request is approved, EEO will notify all relevant parties in order to implement the request, including but not limited to, Procurement, DoIT, HRM, and Labor Relations. If the request is denied, EEO will notify the requesting employee via a written decision which shall include the basis of the denial and their appeal rights.

An individual dissatisfied with the resolution of a reasonable accommodation request can ask the IDES Director to reconsider the decision. An individual appealing the decision to the Director must file their request within 10 business days of the date of the decision, when possible. Filing an appeal to the Director will not extend the time limits for initiating administrative, statutory, or collective bargaining claims.

IDES employees provided reasonable accommodation shall be granted a reasonable period during regular working hours to familiarize themselves with and to develop reasonable competency in the use of any new aids, equipment, or devices provided to them.

IDES has entered into an agreement with AFSCME concerning reasonable accommodation for employees with disabilities, the specific language of which is set forth in the IDES/AFSCME Supplemental Agreement.

**.302 Accommodating Job Applicants with Disabilities**

Qualified individuals with disabilities applying for jobs with IDES have the right to request reasonable accommodation which will enable them to participate in all aspects of the hiring process, including submission of employment applications and participation in the examination and interviewing process. It is permissible to ask a job applicant whether they will need a reasonable accommodation to participate in the hiring process. A qualified job applicant with a disability is entitled to a reasonable accommodation during the hiring process even if it appears it will not be possible to provide a reasonable accommodation enabling the job applicant to perform the essential functions of the job for which the applicant has applied.

Job applicants may request reasonable accommodations in writing. The EO Officer or ADA Coordinator shall assist with the completion of reasonable accommodation request forms in order to process and document the request. Provision of auxiliary aids and services for individuals with impaired vision and/or hearing under subsection .40 may be initially approved by a manager. The original documents shall be forwarded to the EO Officer with copies retained with the application. Except for auxiliary aids and services under subsection .40 initially approved by a manager, the EO Officer shall determine whether or not to grant the request and shall make every reasonable effort to provide a response to the job applicant within five working days following the EO Officer's receipt of the request, when possible.

**.303 Accommodating Clients with Disabilities**

Qualified individuals with disabilities have the right to request reasonable accommodations which will enable them to participate in and enjoy the benefits of IDES programs, services, and activities in an equal and meaningful way.

IDES clients may request reasonable accommodation in writing. The EO Officer or ADA Coordinator shall assist with the completion of reasonable accommodation request forms in order to process and document the request. Provision of auxiliary aids and services for individuals with impaired vision and/or hearing under subsection .40 may be initially approved by a manager. The original documents shall be forwarded to the EO Officer with copies retained with the cost center. Except for auxiliary aids and services under subsection .40 initially approved by a manager, the EO Officer shall determine whether or not to grant the request and shall make every reasonable effort to provide a response to the IDES client within five working days following the EO Officer's receipt of the request, when possible.

**.304 Acquisition of Equipment or Devices**

The equipment and devices that IDES will provide as a reasonable accommodation do not include personal use items needed to conduct daily activities such as hearing aids and eyeglasses. For individuals who are visually impaired, equipment or devices that may be provided include, but are not limited to, such items as adaptive computer hardware and software, electronic visual aids, braille devices, talking calculators, magnifiers, audio recordings, and braille material.

The EO Officer may consult with the Procurement Division to obtain vendor, cost, and specifications prior to ordering accommodation equipment. Procurement will assist EEO with ordering equipment using the procedures described in Section 3010, "Procurement of Goods and Services," of this Manual. The order request submitted by EEO will be charged to the cost center from which the request originated. If the equipment or device to be purchased is in the information technology category, the EO Officer may consult with DoIT regarding cost and specifications. The agency IT Coordinator will submit requests for IT equipment to DoIT through an Equipment Service Request (ESR) form and link. All reasonable accommodation requests will be flagged as such in the comment field for tracking purposes (e.g., reasonable accommodation request).

Requests for telecommunications equipment are routed through the agency's Telecom Coordinator, who will submit requests to Central Management Services and DoIT. **Note:** In rare instances (e.g., CMS cannot process the request because of budget or resource issues), telecom purchases may be made through the usual internal SAP process, beginning with entering a shopping cart (obligation request) by EEO.

Once ordered, Procurement, DoIT, or Telecom will notify EEO, by email, once the accommodation items are ordered, and will notify EEO of the anticipated delivery date following creation of the purchase order. EEO will, in turn, notify the requesting employee, by email, of the anticipated delivery date. Upon delivery, the equipment will be bar-coded by Office Services (if it meets the cost threshold as provided in Section 1101 of this Manual).

The cost center and/or employee receiving the accommodation item shall notify EEO that the accommodation item was received. EEO will follow up with an employee who has been provided equipment or a device as a reasonable accommodation to ensure that the accommodation meets that employee's needs. Normally, the follow-up will occur two or more weeks following delivery to allow the employee a reasonable period to adjust to and develop competency in the use of the new aids or devices provided.

Equipment or devices purchased for reasonable accommodation purposes for employees are considered assigned to the requesting employee rather than to the cost center to which the employee is currently assigned. The equipment or devices will follow the employee in the event of the employee's transfer following the procedures set forth in Section 1101 of this Manual. EEO may reclaim the equipment or devices or transfer the equipment or devices to another employee upon request if the initial requester leaves the Department, is on an extended leave of absence, or no longer needs the accommodation. The cost center manager will notify EEO of any event that may result in the transfer or reassignment of the reasonable accommodation item. An OS-5 will need to be prepared by the cost center managers, when equipment is transferred or reassigned. Accommodation equipment cannot be transferred or reassigned to another employee without the express authorization from EEO. Cost center managers must notify EEO immediately if any equipment becomes available.

**.305 Use of Space Heaters**

Qualified IDES employees with disabilities whose physician recommends the use of a space heater as an accommodation shall request such accommodation by completing form EEO-5, Request for Reasonable Accommodation, and Form EEO-7, Physician's Medical Review for Reasonable Accommodation Request. The forms shall be submitted through proper channels through the EEO Office for decision. Refer to subsection .301 for proper submission of the forms and for procedures for providing reasonable accommodations. Space heater requests must be approved by CMS. The IDES EEO Office will process the request with CMS and inform the requesting employee of the final decision.

Once the EEO Office issues a written decision regarding the space heater accommodation request, CMS will be notified through a Space Heater Request Form. EEO must provide CMS with the employee's EEO-7, or an equivalent doctor's statement, with the form. CMS will then conduct an assessment of the employee's office or work area before approving the use of a space heater there. If CMS approves the use of the space heater in the employee's work area, they will notify the employee and EEO Office. The EEO Office will then issue an amended decision referencing CMS's approval or denial of the use of the space heater. The employee's manager will also be notified of the decision regarding the use of the space heater.

**.40 AUXILIARY AIDS AND SERVICES FOR INDIVIDUALS WITH IMPAIRED VISION/HEARING**

This subpart explains what auxiliary aids and services are available to IDES employees, job applicants, and clients with impaired vision or hearing, and how to obtain them.

As stated in the notice, [Equal Opportunity is the Law](#), auxiliary aids and services are available upon request to individuals with disabilities. Such auxiliary aids include, but are not limited to, sign language interpreters, readers, taped texts, or other effective methods to communicate with persons with impaired vision or hearing enabling them to perform the essential functions of their job, participate in the hiring process, or participate in the Department's programs, services, and activities, including the understanding of eligibility and appeal rights.

**.401 Text Telephone (TTY) or Other Similar Communication**

A TTY or other similar communication is installed in the IDES Central Office to provide statewide service and referral information. TTY's or other similar communication devices are used by individuals with impaired hearing or speech to communicate by telephone. Persons with impaired hearing who have questions or require information

about Department programs should be advised to use the TTY number: 888-340-1007 and /or 866-488-4016.

**.402 Illinois Relay Center**

The Illinois Relay Service, also known as Illinois Relay 711, is a 24 hour per day, seven days per week service which provides a communications link between persons using a text telephone and persons using a standard voice telephone. Specially trained communications assistants relay conversations over a telephone between a person using a TTY or other similar communication and a person using a voice telephone. This is done by communicating simultaneously with both parties. When the person using the voice telephone speaks, the communications assistant types the information to the TT or other similar communication caller. When the TT or other similar communication caller responds, the communications assistant voices the typed information to the person on the standard voice telephone. The Illinois Relay Service may be used by calling the following numbers: TT or other similar communication users dial 800-526-0844 or 711. Telephone users dial 800-526-0857 or 711. Spanish-to-Spanish users dial 800 501-0864 (TTY) or 711. More detailed instructions and additional telephone numbers are listed in the Illinois Relay Service [website](#).

When the communications assistant answers, the caller provides the telephone number and the type of call the caller wants to make. The communications assistant places the call and, when the person answers, tells the caller to begin the conversation. Inquiries about the Illinois Relay Center should be directed to the EO Officer at 312-793-9290.

**.403 Interpreter's Services for the Hearing Impaired**

When possible, the services of qualified volunteers should be used. If no volunteers are available, cost centers should consult the [Illinois Deaf and Hard of Hearing Commission](#) website to arrange for a qualified interpreter.

If necessary, other sources for sign language interpreters may be used such as those available through the Anixter Center - Chicago Hearing Society, 773-248-9121, and the Chicago Area Interpreter Referral Service, Voice 312895-4300. If necessary, the EO Officer is available to help in procuring interpreter services.

**.404 Interpreter's Fees**

The cost center and the interpreter shall mutually agree upon a fee. The Local Office should attempt to provide the required services at the most economical cost. The level of fees paid to interpreters for the hearing impaired depends upon whether such interpreters are certified by the National Registry of Interpreters for the Deaf and their certificate type.

Cost centers should use petty cash for payment of interpreter's fees if under the petty cash limit as provided in Section 3002 of this Manual. Fees at or over the petty cash limit require the cost center to enter a shopping cart to request services and may notify the EO Officer by submitting Form EEO-3. (See subsection .401.) The cost center manager is responsible for submitting a monthly report to the EO Officer of all expenditures regarding the provision of auxiliary aids or services for persons with disabilities.

**.405 Reporting of Auxiliary Aids or Services Requested and Provided**

Whether or not an auxiliary aid or service to an individual with a disability is approved or denied, the cost center may complete Form [EEO-3, Auxiliary Aids Program Accessibility](#) and submit it to the EO Officer.

**.50 INDIVIDUALS WITH DISABILITIES THAT POSE A DIRECT THREAT TO HEALTH AND SAFETY**

An individual with a disability that poses a direct threat to the health or safety of themselves, or others is not a qualified individual with a disability and, therefore, is not entitled to reasonable accommodation for that disability. The definition of a direct threat is provided in subsection .201. For further information, contact the EO/EEO Officer at 312-793-9290.

**.60 COMPLAINTS**

IDES employees, IDES clients, and members of the general public may file complaints of discrimination, including discrimination based on disability, that relate to IDES programs, activities, or employment with the IDES Office of Equal Employment Opportunity/Affirmative Action under Section 1201 of this Manual, or with an outside Federal or state agency. A list of various outside Federal and state agencies and the time frames within which complaints must be filed with them is provided in subsection 1201.40 of this Manual.

**Note:** It is **not** necessary to file a complaint with the IDES Office of Equal Employment Opportunity/Affirmative Action before filing one with an outside agency.

**.70 ACCESSIBILITY OF DOCUMENTS**

IDES employees will ensure that its documents and/or correspondence, will comply with all Federal and/or State Accessibility laws, to ensure that people have equal and meaningful access to pertinent IDES information. IDES employees will also use “plain language” when possible, when drafting documents and/or correspondence. Lastly, IDES will not post any inaccessible or any document using overly complicated language to its public facing internet site. Documents which are not accessible will be sent back to its creator and required to be revised to pass the minimum accessibility test provided by the accessibility checker.

To be truly accessible it is not enough for a document to look well-presented. It also needs to be able to be understood by a wide audience and needs to work well with screen reading software and/or other ADA related software. There are several principals on creating an accessible and easily understood document. See below for guidelines:

IDES employees will use the following as a guideline when creating and/or drafting documents:

**1. Key Principles for Electronic Publishing:**

- a. Use proper heading structures
- b. Write in short simple sentences
- c. Write in plain language and avoid jargon
- d. Use a common plain font and text size of at least 12 point
- e. Use proper list formatting for numbered or bullet lists
- f. Provide meaningful description of important images
- g. Check accessibility of the document by using Word's built-in accessibility checker.

**2. Use Proper Headings.** You should use appropriate heading structure meaning using hierarchy of headings to enable screen readers to identify headings.

**3. Write in Plain Language.** It is essential to use clear, simple language to communicate effectively. This means using language that the reader can easily understand it the first time they hear or read it.

**4. Presentation and Layout.** How you present material can have an impact on reading comprehension. It means use a clear font and make sure the size is large enough to read. Usually, Times New Roman font with font size 12 or larger is recommended.

**5. Tables, Lists, Images, and Hyperlinks.** Tables in Word need to have a simple structure and give column header information. To work with a screen reader, Word tables must not contain split or merged cells, completely blank rows or columns, or nested tables. For screen reader users, it is also useful to add a short descriptive caption for each table under Table Properties > Alt Text. For the listing feature to work with screen-reading software, the author must create the list using the built-in list formatting within Word. If a document is likely to be made available electronically, you must also consider adding 'alternative text' to your images via the 'Edit Alt Text' function which can be accessed by right-clicking on any image. Screen readers will subsequently convey the description that you have added as an alternative to the user being able to see it. Adding hyperlinks in Word is very easy through right-clicking on any word or group of words. However, it is important that the hyperlink makes sense as standalone information. It needs to convey clear and accurate information about what it links to. You can check the accessibility of your document in Word by using its built-in checker. The 'Check Accessibility' button is available under the 'Review' menu. This will highlight any accessibility-related problems with your document, describe why you should fix them, and give you guidance on how to do so. If you need to convert a Word document to a PDF, follow the instructions above to format headings, tables and lists with Word styles. Also, convert any embedded Office objects to images and add alternative text to all your images.

**.80 REFERENCES**

The Americans with Disabilities Act of 1990 (42 USC 12101)

The Americans with Disabilities Act Amendments Act of 2008

Environmental Barriers Act (410 ILCS 25/1)

Illinois Accessibility Code (71 Ill. Adm. Code 400)

Illinois Information Technology Access Act (P.A. 095-0307)

Section 504 of the Rehabilitation Act of 1973, as amended (29 USC 794)

Title VII of the Civil Rights Act of 1964, as amended (42 USC 2000e)

The Illinois Human Rights Act (775 ILCS 5/1-101)

Parts 32, 33, and 38 of the regulations of the U.S. Department of Labor (29 CFR Part 32, 33, and 38)

Section 1.5 of the State Lawsuit Immunity Act (745 ILCS 5/1.5)

Part 2500 of the joint rules of the Department of Human Rights and the Human Rights Commission (56 Ill. Adm. Code 2500)

Section 1101, Property Control Procedures - Cost Center Managers, of the Procedures Manual

Section 1200, Equal Employment Opportunity/Affirmative Action Program: Statement of Policy and Complaint Investigation Procedure, of the Procedures Manual

Section 1201, Complaint Investigation Procedures, of the Procedures Manual

Section 1204, Monitoring Nondiscrimination in Delivery of Employment Service/Unemployment Insurance Functions, of the Procedures Manual

Section 3002, Petty Cash, of the Procedures Manual

Section 3003, Preparation of the NPS Request for the Obligation of Funds, of the Procedures Manual

Section 3010, Procurement of Goods and Services, of the Procedures Manual

Agreement between AFSCME and State of Illinois, Supplemental Agreement

Creating Accessible Documents by AbilityNet (<https://abilitynet.org>).

## **1206 SERVING CLIENTS WITH LIMITED ENGLISH PROFICIENCY (LEP)**

### **.10 BACKGROUND**

Clients with Limited English Proficiency (LEP) must be provided meaningful access to IDES (or "Department") programs and services. An LEP client is a person whose primary language is a language other than English and who requires interpretation and/or translation services to meaningfully and effectively participate in IDES services, benefits, and programs.

Under no circumstances shall services to an LEP client be denied or unnecessarily delayed because of the client's Limited English Proficiency. Where possible, an LEP client should be served by a language option employee who speaks the client's language. When no on-site interpreter is available, the telephone-accessed language interpreter service vendor under contract with CMS and/or IDES should be used. (See subsection .204 for instructions on how to access and use the interpreter service.) Any refusal of IDES interpreter services by an LEP client should be noted in their file and reported, as soon as practicable, to the Equal Employment Officer.

In order to maintain compliance with Federal and State regulations, laws and administrative rules ensuring language access, IDES has designated a Language Access Coordinator. The Language Access Coordinator can be reached at:

Language Access Coordinator  
Attention Equal Opportunity Office  
115 S. LaSalle Street, 17th Floor  
Chicago, Illinois 60603  
Office: 312-793-9290  
Facsimile: 312-793-0302

Please contact the Language Access Coordinator for assistance regarding translations, interpreter services and any other bilingual or language access needs.

### **.11 POLICY STATEMENT**

It is the policy of IDES that staff shall take reasonable steps to provide Limited English Proficient (LEP) persons with meaningful access to all programs or activities conducted both by the Department and by entities receiving funding from the Department.

This policy is based on the principle that it is the responsibility of the Department and not the LEP person to take reasonable steps to ensure that communications between the Department and the LEP person are not impaired as a result of the Limited English Proficiency of the individual.

Department staff shall take reasonable steps to effectively inform the public of the availability of language accessible programs and activities, including hanging signs and posters in the Local Offices, consistent with Federal and State laws, rules, and statutes.

### **.12 PURPOSE AND AUTHORITY**

The purpose of this policy is to make reasonable efforts to eliminate or reduce Limited English Proficiency as a barrier to accessing IDES benefits, programs, or activities. This Plan establishes guidelines in accordance with U.S. Department of Labor (USDOL) nondiscrimination regulations, Federal and State Nondiscrimination laws, statutes, administrative rules and internal IDES policies and procedures.

### **.13 DEFINITIONS**

**Effective Communication** – Communication sufficient to provide the LEP individual with substantially the same level of access to services received by individuals who are not LEP. For example, staff must take reasonable steps to ensure communication with an LEP individual is as effective as communication with others when providing similar programs and services.

**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.

**Language Assistance Services** – Oral and written language services needed to assist LEP individuals to communicate effectively with staff, and to provide LEP individuals with meaningful access to, and an equal opportunity to participate fully in, the services, activities, or other programs administered by IDES.

**Limited English Proficient (LEP) Individuals** – Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English. LEP individuals may be competent in English for certain types of communication (e.g., speaking or understanding), but still be LEP for other purposes (e.g., reading or writing).

**Meaningful Access** – Language assistance that results in accurate, timely, and effective communication at no cost to the LEP individual.

**Multilingual staff or employee** – A staff person or employee who has demonstrated proficiency in English and reading, writing, speaking, or understanding at least one other language. 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.

**Primary Language** – An individual's primary language is the language in which an individual most effectively communicates.

**Program or Activity** – The term "program or activity" and the term "program" mean all of the operations of the Department, including but not limited to, Unemployment Insurance benefits, workshops, employment services, outreach, and all other benefits, programs and services.

**Qualified Translator or Interpreter** – An in-house or contracted translator or interpreter who have demonstrated their competence to interpret or translate.

**Sight Translation** – Oral rendering of written text into spoken language by an interpreter without change in meaning based on a visual review of the original text or document.

**Translation** – The replacement of written text from one language (source language) into an equivalent written text in another language (target language).

**Vital Document** – Paper or electronic written material that contains information that is critical for accessing IDES' programs or activities or is required by law.

**.14 SCOPE OF POLICY / STAFF COMPLIANCE**

IDES staff should take reasonable steps to provide language assistance services to LEP individuals when they encounter or have reason to believe that they may encounter LEP individuals in the course of fulfilling IDES' mission. Subject to guidelines set forth herein, staff should take reasonable steps to provide language assistance services upon request by an

LEP person who wishes to access Department programs or activities or to whom Department staff wishes to communicate.

This directive is intended only to improve the internal management of the Department's language access program, and does not create any right or benefit, substantive or procedural, enforceable at law or equity by a party against the State of Illinois, its agencies, its officers or employees, or any person. Because this document is intended for the internal management of the Department's language access program, it is not intended to be cited in any judicial or administrative proceeding. Administration of the programs discussed herein is within the sole discretion of the Department.

**.15 OPERATIONAL GUIDELINES IN THE PROVISION OF LANGUAGE ASSISTANCE SERVICES**

**.151 Quality Control**

Ensuring the quality and accuracy of language assistance services provided by the Department is critical to providing LEP individuals with meaningful access to Department programs and activities. IDES should take reasonable steps to ensure that all staff or contracted personnel who serve as translators, interpreters or who communicate "in-language" with LEP persons are competent to do so. Considerations of competency in light of particular tasks may include:

- Demonstrated proficiency in and ability to communicate information accurately in both English and the other language;
- Knowledge in both languages of any specialized terms or concepts particular to the program or activity and of any particularized vocabulary used by the LEP person;
- Understanding and following confidentiality, impartiality, and ethical rules to the same extent as Department staff;
- Understanding and adhering to their role as interpreters, translators, or multilingual staff.

**.152 Translation of Department Documents**

**• Translating Vital Documents**

The Department prioritizes translation of vital documents when possible. Classification of a document as "vital" depends upon the importance of the program, information, encounter, or service involved, and the consequence to the LEP person if the information in question is not provided accurately or in a timely manner.

**• Translating the Department's Web Content**

IDES takes reasonable steps to translate public website content and electronic documents that contain vital information about agency programs and services.

**.153 Identifying LEP Individuals**

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

- Self-identification by the non-English speaker, LEP individual or companion;

- Inquiring as to the primary language of the individual if they have self-identified as needing language assistance services;
- Asking a multilingual staff or qualified interpreter to verify an individual's primary language;
- Using an "I Speak" language identification card or poster

**.154 Staff Training**

IDES staff needs to know how and when to access language assistance services. For policies and procedures to be effective, IDES staff should take reasonable efforts to ensure that new and existing staff members periodically receive training on: the content of the language access policy; identifying language access needs; and, providing language assistance services to LEP individuals, when practicable.

Each IDES division should take reasonable steps to ensure that relevant staff members receive training on the Department's language access policies, Plan, and procedures, when practicable. Training may include, but is not limited to:

- Identifying the language needs of an LEP individual;
- Working with an interpreter in person or on the telephone;
- Requesting documents for translation;
- Accessing and providing language assistance services through multilingual employees, in-house interpreters and translators, or contracted personnel;
- Duties of professional responsibility with respect to LEP individuals; Interpreter ethics; and
- Tracking the use of language assistance services.

**.20 PROCEDURES FOR OBTAINING INTERPRETERS**

**.201 Posting Notices**

Notices in Spanish and, where possible, any other language commonly used by LEP clients of a Local Office announcing the availability of free interpretation services should be conspicuously posted at the entrance to the Local Office. A language identification sign instructing an LEP client to point to their language should be conspicuously posted in the intake area.

**.202 Identifying LEP Clients**

Where possible, language option employees (i.e., bilingual employees) should serve as intake staff or as resource persons (See Section 5001 of this Manual). The intake staff representative identifies LEP clients and determines the language in which the LEP client needs service. If that language is not readily apparent, it should be determined through use of either the language identification sign or language identification flash cards. If the language cannot be determined through use of the sign or flash cards, it should be determined through use of the language interpreter service.

**.203 Selecting an Interpreter Service**

IDES is responsible for providing official interpreters as needed by the Department's clients. IDES language option staff or interpreter services must be used as the primary means to interpret for the client. However, an LEP client may provide an interpreter of their choosing at their expense but only as a supplement and not in lieu of the interpreter services provided by IDES. Interpreter services are always available for use by the Local Office representative. The Local Office representative must not rely only on an interpreter provided by the LEP client. IDES reserves the right to require that client-supplied interpreters are certified or are otherwise qualified to provide interpreter services.

A Local Office may also use certified or otherwise qualified volunteer interpreters as a supplement, and not in lieu of, to the Local Office interpreter and interpreter services. When possible, volunteer interpreters should be provided with the same interpreter training as language option employees.

**.204 Using Telephone-Accessed Interpreter Services**  
**IDES staff shall:**

1. Determine the preferred language.
2. If the client contact is in person, take the client to a suitable location for a conference call by speaker telephone. If the client contact is by telephone, asks the caller to please stay on the line and places the caller on hold. If three-way calling is available at the staff representative's workstation, obtains a second dial tone and adds the non-English speaking person to the line. If not, tells the client that he will be contacted (using the interpreter's conference capability) within the next few minutes.
3. Secure the services of an interpreter by following the instructions on the vendor's [instruction card](#).
4. When the interpreter comes on the line and, in the presence of the client, briefly explain the purpose of the interview.

**.205 IBIS Entry**

IDES staff must enter the LEP claimant's preferred language on the Personal Information screen using the LEP dropdown menu. If the preferred language is not in the list, select Other from the dropdown menu and then manually insert the preferred language in the Other field.

**.30 DOCUMENT TRANSLATION SERVICES**

Documents received in other languages from IDES clients can be translated by State designated vendors. Contact the Equal Employment Office, 312-793-9290 for assistance and/or Procurement Division, 312-793-2209, for current vendors. A vendor will be selected who can translate the document.

**.40 REFERENCES**

Executive Order 13166 dated 8/11/2000, U. S. Department of Justice

Part 31 of the regulations of the U.S. Department of Labor (29 CFR Part 31)

Part 38 of the regulations (Civil Rights Act of 1964) of the U.S. Department of Labor (29 CFR Part 38) (42 USC 2000)

Title VI, Prohibition against National Origin Discrimination as it Affects Persons with Limited English Proficiency, Federal Register: January 12, 2004, Volume 69, Number 7, Pages 1763-1768

[United States Department of Justice Language Access Plan](#)

Section 1113, IDES Telecommunications Equipment/Services, of the Procedures Manual

Section 5001, IBIS Claims Taking Process, of the Procedures Manual

Section 5022, Telephone Adjudication, of the Procedures Manual

## 1207 REASONABLY ACCOMMODATING RELIGIOUS PRACTICES OF IDES EMPLOYEES AND PROSPECTIVE EMPLOYEES

### .10 POLICY STATEMENT

In accordance with Section 1200 of this Manual, it is Department policy to fully comply with all State and Federal legal authority pertaining to reasonable accommodation of the religious observations, practices, and beliefs (collectively “religious practices”) of IDES employees and prospective employees in connection with IDES employment. This policy applies to all aspects of IDES employment, including, without limitation, hiring, promotion, and terms and conditions of employment. Refusal of reasonable accommodation under this Section may be a form of unlawful discrimination (see Section 1200 of this Manual).

Employees who wish to initiate a request for religious accommodation must complete a [Request for Religious Accommodation Form](#).

IDES may deny a religious accommodation under this Section if it would not be reasonable. A religious accommodation would not be reasonable if: (1) the accommodation would impose ***undue hardship***; or (2) the practice to be accommodated is ***not religious***.

- ***Undue Hardship. Significant difficulty, disruption, or expense with respect to IDES or other State of Illinois operations.*** The factors IDES will consider when determining undue hardship include, without limitation: (i) whether a deferral of work hours would be inconsistent with the Department's operational needs (see subsection .30 below); (ii) whether a religious practice would impose significant difficulty, disruption, or expense (see subsection .40 below); and (iii) whether a religious practice would imply the establishment of religion by the State (see subsection .50 below).
- ***Non-Religious Practice.*** Questions, if any, about whether a practice to be accommodated is religious will be resolved in accordance with pertaining legal authority. (See Section 1200 of the Manual).

### .20 BACKGROUND

Under State law, Section 2-101(F) of the Illinois Human Rights Act (IHRA) defines religion with respect to employment as:

“[A]ll aspects of religious observance and practice, as well as belief, unless an employer demonstrates that he is unable to reasonably accommodate an employee's or prospective employee's religious observance or practice without undue hardship on the conduct of the employer's business.” (775 ILCS 5/2-101(F))

Section 2-102(E) of the IHRA requires public employers, such as IDES, to allow employees to defer their work hours, when consistent with operational needs, to times outside their regular work schedules to practice their religious beliefs during times within their regular work schedules. (See Section 2005.222 of this Manual.)

Under Federal law, Section 701(j) of Title VII of the Civil Rights Act of 1964 (Title VII) provides a definition of religion with respect to employment similar to that of IHRA Section 2-101(F). In addition, the Equal Employment Opportunity Commission (EEOC) issued regulations under Section 701(j) that set accommodation guidelines similar to those of IHRA Section 2-101(F):

“Section 701(j) makes it an unlawful employment practice under [Title VII] for an employer to fail to reasonably accommodate the religious practices of an employee or prospective employee, unless the employer demonstrates that accommodation would result in undue hardship on the conduct of its business.” (29 CFR 1605.2(b)(1))

EEOC guidelines also address the definition of religious practice or belief:

“In most cases whether or not a practice or belief is religious is not at issue. However, in those cases in which the issue does exist, the [EEOC] will define religious practices to include moral or ethical beliefs as to what is right and wrong which are sincerely held with the strength of traditional religious views.” (29 CFR 1605.1)

**.30 DEFERRAL OF WORK HOURS TO PRACTICE RELIGIOUS BELIEFS**

The Department addresses the requirement under Section 2-102(E) of the IHRA to defer an employee’s work hours, when consistent with operational needs, in order to practice their religious beliefs in subsection 2005.222 of this Manual.

**.40 RELIGIOUS PRACTICES THAT IMPOSE SIGNIFICANT DIFFICULTY, DISRUPTION, OR EXPENSE**

The Department will determine that accommodating a religious practice in connection with IDES employment would be unreasonable if the religious practice would impose significant difficulty, disruption, or expense on IDES or other State of Illinois operations. This may be shown by factors including, without limitation:

- The nature of an accommodation considering the programs, services, and activities it would affect and the need to provide them effectively, efficiently, and without disruption, including whether it would cause health, safety, or security hazards or concerns;
- Disrupting the ability of other employees to perform their job duties, including employee productivity and morale; and,
- The cost of an accommodation considering funding available in connection with the accommodation.

Complaints about a particular religious practice are not required, but may be considered, when determining the reasonableness of an accommodation under this Section. Any questions about whether a particular religious practice would conform with this subsection should be directed to the IDES EEO Officer.

**.401 Religious Dress and Grooming**

The Department will accommodate employees’ religious dress and grooming practices unless accommodation would disrupt IDES operations. For purposes of this subsection, disruption of IDES operations does not simply mean employee disgruntlement. There must be operational factors such as a disruption of employee productivity or an implied establishment of religion. (See subsection .50.)

Examples of religious dress and grooming practices that the Department may accommodate include, but are not limited to: (i) wearing religious clothing or articles (e.g., a Christian cross, a Muslim hijab (headscarf), a Sikh turban, a Sikh kirpan (symbolic miniature sword)); (ii) observing a religious prohibition against wearing certain garments (e.g., a Muslim, Pentecostal Christian, or Orthodox Jewish woman's

practice of wearing modest clothing, and of not wearing pants or short skirts); and (iii) adhering to shaving or hair length observances (e.g., Sikh uncut hair and beard, Rastafarian dreadlocks, or Jewish peyes (sidelocks)). Accommodation of religious dress and grooming practices does not give employees a right to accommodation of secular dress and grooming practices.

**.50 RELIGIOUS PRACTICES THAT IMPLY THE ESTABLISHMENT OF RELIGION**

The First Amendment of the U.S. Constitution prohibits a state agency from allowing employees to engage in religious practices that could imply the establishment of religion by the state to agency customers or the general public. These restricted practices may involve the personal display of religious symbols or other forms of personal religious expression.

Complaints about a particular religious practice from IDES customers or the general public will be given serious consideration. Any questions about whether a particular religious practice would conform with this subsection .50 should be directed to the IDES EEO Officer.

**.501 Christmas Displays**

The Department may accommodate an employee's display in their personal work area of secular Christmas symbols (e.g., a Christmas tree, or images or figures of Santa Claus, a Santa Claus house, reindeer pulling Santa's sleigh, Christmas carolers, etc.) when reasonable under subsection .40, even if the display is visible to IDES customers or the general public. Any questions about a particular Christmas display should be directed to the IDES EO Officer.

**.60 COMPLAINTS**

IDES employees and prospective employees may file complaints of discrimination, including discrimination based on the failure to reasonably accommodate a religious practice, with the IDES EEO/AA Office under Section 1201 of this Manual, or with an outside Federal or state agency. A list of various outside Federal and state agencies and the time frames within which complaints must be filed with them is provided in subsection 1201.40 of this Manual.

It is not necessary to file a complaint with the IDES EEO/AA before filing one with an outside agency. Please see Subsection 1201 of this Manual for further guidance on how and where to file a complaint of discrimination, including, but not limited to, a complaint based on discrimination for failure to reasonably accommodate a religious practice.

**.70 REFERENCES**

Title VII of the Civil Rights Act of 1964 (42 USC 2000e)

Section 188 of the Workforce Innovation and Opportunity Act of 2014 (29 USC 2938)

The Illinois Human Rights Act (775 ILCS 5/1-101)

Part 1605 of the regulations of the U.S. Equal Opportunity Commission (29 CFR Part 1605)

U.S. Department of Labor Nondiscrimination Regulations (29 CFR 38)

Religious Garb and Grooming in the Workplace: Rights and Responsibilities, *U.S. Equal Opportunity Commission* (03/06/2014)

Section 1200, Unlawful Discrimination; Reasonable Accommodation; Equal Employment Opportunity/Affirmative Action: Statement of Policy, of the Procedures Manual

Section 1201, EEO/EO Complaint Procedures, of the Procedures Manual

Section 1202, Unlawful Harassment and Unlawful Retaliation of the Procedures Manual

Section 2005, Time and Leave, of the Procedures Manual

# Exhibit 2

Limited English Proficient Policy & Procedure

## **1206 SERVING CLIENTS WITH LIMITED ENGLISH PROFICIENCY (LEP)**

### **.10 BACKGROUND**

Clients with Limited English Proficiency (LEP) must be provided meaningful access to IDES (or "Department") programs and services. An LEP client is a person whose primary language is a language other than English and who requires interpretation and/or translation services to meaningfully and effectively participate in IDES services, benefits, and programs.

Under no circumstances shall services to an LEP client be denied or unnecessarily delayed because of the client's Limited English Proficiency. Where possible, an LEP client should be served by a language option employee who speaks the client's language. When no on-site interpreter is available, the telephone-accessed language interpreter service vendor under contract with CMS and/or IDES should be used. (See subsection .204 for instructions on how to access and use the interpreter service.) Any refusal of IDES interpreter services by an LEP client should be noted in their file and reported, as soon as practicable, to the Equal Employment Officer.

In order to maintain compliance with Federal and State regulations, laws and administrative rules ensuring language access, IDES has designated a Language Access Coordinator. The Language Access Coordinator can be reached at:

Language Access Coordinator  
Attention Equal Opportunity Office  
115 S. LaSalle Street, 17th Floor  
Chicago, Illinois 60603  
Office: 312-793-9290  
Facsimile: 312-793-0302

Please contact the Language Access Coordinator for assistance regarding translations, interpreter services and any other bilingual or language access needs.

### **.11 POLICY STATEMENT**

It is the policy of IDES that staff shall take reasonable steps to provide Limited English Proficient (LEP) persons with meaningful access to all programs or activities conducted both by the Department and by entities receiving funding from the Department.

This policy is based on the principle that it is the responsibility of the Department and not the LEP person to take reasonable steps to ensure that communications between the Department and the LEP person are not impaired as a result of the Limited English Proficiency of the individual.

Department staff shall take reasonable steps to effectively inform the public of the availability of language accessible programs and activities, including hanging signs and posters in the Local Offices, consistent with Federal and State laws, rules, and statutes.

### **.12 PURPOSE AND AUTHORITY**

The purpose of this policy is to make reasonable efforts to eliminate or reduce Limited English Proficiency as a barrier to accessing IDES benefits, programs, or activities. This Plan establishes guidelines in accordance with U.S. Department of Labor (USDOL) nondiscrimination regulations, Federal and State Nondiscrimination laws, statutes, administrative rules and internal IDES policies and procedures.

### **.13 DEFINITIONS**

**Effective Communication** – Communication sufficient to provide the LEP individual with substantially the same level of access to services received by individuals who are not LEP. For example, staff must take reasonable steps to ensure communication with an LEP individual is as effective as communication with others when providing similar programs and services.

**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.

**Language Assistance Services** – Oral and written language services needed to assist LEP individuals to communicate effectively with staff, and to provide LEP individuals with meaningful access to, and an equal opportunity to participate fully in, the services, activities, or other programs administered by IDES.

**Limited English Proficient (LEP) Individuals** – Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English. LEP individuals may be competent in English for certain types of communication (e.g., speaking or understanding), but still be LEP for other purposes (e.g., reading or writing).

**Meaningful Access** – Language assistance that results in accurate, timely, and effective communication at no cost to the LEP individual.

**Multilingual staff or employee** – A staff person or employee who has demonstrated proficiency in English and reading, writing, speaking, or understanding at least one other language. 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.

**Primary Language** – An individual's primary language is the language in which an individual most effectively communicates.

**Program or Activity** – The term "program or activity" and the term "program" mean all of the operations of the Department, including but not limited to, Unemployment Insurance benefits, workshops, employment services, outreach, and all other benefits, programs and services.

**Qualified Translator or Interpreter** – An in-house or contracted translator or interpreter who have demonstrated their competence to interpret or translate.

**Sight Translation** – Oral rendering of written text into spoken language by an interpreter without change in meaning based on a visual review of the original text or document.

**Translation** – The replacement of written text from one language (source language) into an equivalent written text in another language (target language).

**Vital Document** – Paper or electronic written material that contains information that is critical for accessing IDES' programs or activities or is required by law.

**.14 SCOPE OF POLICY / STAFF COMPLIANCE**

IDES staff should take reasonable steps to provide language assistance services to LEP individuals when they encounter or have reason to believe that they may encounter LEP individuals in the course of fulfilling IDES' mission. Subject to guidelines set forth herein, staff should take reasonable steps to provide language assistance services upon request by an

LEP person who wishes to access Department programs or activities or to whom Department staff wishes to communicate.

This directive is intended only to improve the internal management of the Department's language access program, and does not create any right or benefit, substantive or procedural, enforceable at law or equity by a party against the State of Illinois, its agencies, its officers or employees, or any person. Because this document is intended for the internal management of the Department's language access program, it is not intended to be cited in any judicial or administrative proceeding. Administration of the programs discussed herein is within the sole discretion of the Department.

**.15 OPERATIONAL GUIDELINES IN THE PROVISION OF LANGUAGE ASSISTANCE SERVICES**

**.151 Quality Control**

Ensuring the quality and accuracy of language assistance services provided by the Department is critical to providing LEP individuals with meaningful access to Department programs and activities. IDES should take reasonable steps to ensure that all staff or contracted personnel who serve as translators, interpreters or who communicate "in-language" with LEP persons are competent to do so. Considerations of competency in light of particular tasks may include:

- Demonstrated proficiency in and ability to communicate information accurately in both English and the other language;
- Knowledge in both languages of any specialized terms or concepts particular to the program or activity and of any particularized vocabulary used by the LEP person;
- Understanding and following confidentiality, impartiality, and ethical rules to the same extent as Department staff;
- Understanding and adhering to their role as interpreters, translators, or multilingual staff.

**.152 Translation of Department Documents**

**• Translating Vital Documents**

The Department prioritizes translation of vital documents when possible. Classification of a document as "vital" depends upon the importance of the program, information, encounter, or service involved, and the consequence to the LEP person if the information in question is not provided accurately or in a timely manner.

**• Translating the Department's Web Content**

IDES takes reasonable steps to translate public website content and electronic documents that contain vital information about agency programs and services.

**.153 Identifying LEP Individuals**

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

- Self-identification by the non-English speaker, LEP individual or companion;

- Inquiring as to the primary language of the individual if they have self-identified as needing language assistance services;
- Asking a multilingual staff or qualified interpreter to verify an individual's primary language;
- Using an "I Speak" language identification card or poster

**.154 Staff Training**

IDES staff needs to know how and when to access language assistance services. For policies and procedures to be effective, IDES staff should take reasonable efforts to ensure that new and existing staff members periodically receive training on: the content of the language access policy; identifying language access needs; and, providing language assistance services to LEP individuals, when practicable.

Each IDES division should take reasonable steps to ensure that relevant staff members receive training on the Department's language access policies, Plan, and procedures, when practicable. Training may include, but is not limited to:

- Identifying the language needs of an LEP individual;
- Working with an interpreter in person or on the telephone;
- Requesting documents for translation;
- Accessing and providing language assistance services through multilingual employees, in-house interpreters and translators, or contracted personnel;
- Duties of professional responsibility with respect to LEP individuals; Interpreter ethics; and
- Tracking the use of language assistance services.

**.20 PROCEDURES FOR OBTAINING INTERPRETERS**

**.201 Posting Notices**

Notices in Spanish and, where possible, any other language commonly used by LEP clients of a Local Office announcing the availability of free interpretation services should be conspicuously posted at the entrance to the Local Office. A language identification sign instructing an LEP client to point to their language should be conspicuously posted in the intake area.

**.202 Identifying LEP Clients**

Where possible, language option employees (i.e., bilingual employees) should serve as intake staff or as resource persons (See Section 5001 of this Manual). The intake staff representative identifies LEP clients and determines the language in which the LEP client needs service. If that language is not readily apparent, it should be determined through use of either the language identification sign or language identification flash cards. If the language cannot be determined through use of the sign or flash cards, it should be determined through use of the language interpreter service.

**.203 Selecting an Interpreter Service**

IDES is responsible for providing official interpreters as needed by the Department's clients. IDES language option staff or interpreter services must be used as the primary means to interpret for the client. However, an LEP client may provide an interpreter of their choosing at their expense but only as a supplement and not in lieu of the interpreter services provided by IDES. Interpreter services are always available for use by the Local Office representative. The Local Office representative must not rely only on an interpreter provided by the LEP client. IDES reserves the right to require that client-supplied interpreters are certified or are otherwise qualified to provide interpreter services.

A Local Office may also use certified or otherwise qualified volunteer interpreters as a supplement, and not in lieu of, to the Local Office interpreter and interpreter services. When possible, volunteer interpreters should be provided with the same interpreter training as language option employees.

**.204 Using Telephone-Accessed Interpreter Services**  
**IDES staff shall:**

1. Determine the preferred language.
2. If the client contact is in person, take the client to a suitable location for a conference call by speaker telephone. If the client contact is by telephone, asks the caller to please stay on the line and places the caller on hold. If three-way calling is available at the staff representative's workstation, obtains a second dial tone and adds the non-English speaking person to the line. If not, tells the client that he will be contacted (using the interpreter's conference capability) within the next few minutes.
3. Secure the services of an interpreter by following the instructions on the vendor's [instruction card](#).
4. When the interpreter comes on the line and, in the presence of the client, briefly explain the purpose of the interview.

**.205 IBIS Entry**

IDES staff must enter the LEP claimant's preferred language on the Personal Information screen using the LEP dropdown menu. If the preferred language is not in the list, select Other from the dropdown menu and then manually insert the preferred language in the Other field.

**.30 DOCUMENT TRANSLATION SERVICES**

Documents received in other languages from IDES clients can be translated by State designated vendors. Contact the Equal Employment Office, 312-793-9290 for assistance and/or Procurement Division, 312-793-2209, for current vendors. A vendor will be selected who can translate the document.

**.40 REFERENCES**

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Title VI, Prohibition against National Origin Discrimination as it Affects Persons with Limited English Proficiency, Federal Register: January 12, 2004, Volume 69, Number 7, Pages 1763-1768

[United States Department of Justice Language Access Plan](#)

Section 1113, IDES Telecommunications Equipment/Services, of the Procedures Manual

Section 5001, IBIS Claims Taking Process, of the Procedures Manual

Section 5022, Telephone Adjudication, of the Procedures Manual

# Exhibit 3

Vital Documents Appendix

# APPENDIX

IBIS CORRESPONDENCE NUMBER	IBIS CORRESPONDENCE NAME
ADJ001F	Misconduct Questionnaire
ADJ001F(I)	Internet Misconduct Questionnaire
ADJ001L	Response to Employer Protest
ADJ002F	Voluntary Leave Questionnaire
ADJ002F(I)	Internet Voluntary Leave Questionnaire
ADJ003F	Holiday Pay Questionnaire
ADJ003F(I)	Internet Holiday Pay Questionnaire
ADJ004F	Academic Personnel Questionnaire
ADJ004L	Failure to make Installment Payment
ADJ005F	Social Security Questionnaire
ADJ005F(I)	Internet Social Security Questionnaire
ADJ006F	Retirement - Employe Paid Full Amt Questionnaire
ADJ006F(I)	Internet Retirement Pay Questionnaire
ADJ007F	Vacation Pay Separation Layoff Questionnaire
ADJ008F	Scheduled Inventory and/or Vacation Questionnaire
ADJ008F(I)	Internet Scheduled Inventory and/or Vacation Questionnaire
ADJ009F	Unemployed Individual-Wage Questionnaire
ADJ009F(I)	Internet Unemployed Individual-Wage Questionnaire
ADJ010F	Holiday Break Questionnaire
ADJ013F	Earning Requalification Questionnaire
ADJ016F	Refusal of Work Questionnaire
ADJ018F	Trade Readjustment Allowance Questionnaire
ADJ020F	Independent Contractor Questionnaire
ADJ022F	Notice of Local Office Interview
ADJ022F- MWC	Request for Information
ADJ026F	Notice of Labor Dispute Claim, Labor Dispute Questionnaire
ADJ028F(I)	Internet Labor Dispute Questionnaire
ADJ030F	Notice of Unemployment Claim
ADJ031F	School/Training Questionnaire
ADJ031F(I)	Internet School/Training Questionnaire
ADJ033F	Intervening Employment Questionnaire
ADJ038F	IJL Registration Notification Letter
ADJ050F	Re-Employment Services Workshop Notice
ADJ05FC	Re-Employment Services Workshop Schedule Change Notice
ADF050FR	Re-Employment Services Workshop Rescheduled Notice
APL001L	Long Form Higher Authority
APL002L	Short Form Higher Authority
APL006L	Notice of Hearing before the Board of Review (Notice of in person hearing)

IBIS CORRESPONDENCE NUMBER	IBIS CORRESPONDENCE NAME
APL007L	Notice of Pending Appeal
APL011L	Long Form Lower Authority
APL012L	Short Form Lower Authority
APL018L	Notice of Telephone Hearing/Notice of In Person Hearing/ Notice of Rescheduled Hearing
APL019L	Notice of Cancellation
APL020L	Notice of Continuance
BPC001F	Overpayment Transmittal
BPC001P	Overpayment Notice Packet
BPC002L	Returned Payment Notice
BPC002FM-C	Monthly Benefit Audit Notice
BPC002FM-E	Monthly Earnings Verification Notice
BPC002FNH-C	New Hire Benefit Audit Notice
BPC002FNH-E	New Hire Earnings Verification Request
BPC002FQ-E	Quarterly Earnings Verification Request
BPC002FT-E	Tip and Lead Earnings Verification Request
BPC003F	Overpayment Waiver Notice
BPC003L	Address Change Verification Notice
BPC005L	Notice of Overpayment and Recoupment Decision
BPC006L	Claimant Notice of Audit
BPC009L	Notice of Audit
BPC010L	Notice of Telephone Interview-Reissuance of Payment Determination
BPC011L	Notice of Telephone Interview for Quarterly Cross Match
BPC014L	Notice of In Person Interview
BPC020L	Notice of Decision
BPCSI-001L	Victim Letter
BPC027L	Decision Notice - Repayment Agreement
BPC030L	Unaccepted Repayment Agreement
BPC034L	Receipt
BPP001F	Direct Deposit Authorization
BPP004F	1099G Form
BPP006L	Benefit Payment Detail History
BPP007L	On Demand Check
BPP008L	Benefit payment Explanation
BPP013L	Director's Order of Deduction
CLI020L	Claimant Notice of Possible Ineligibility
CLI021L	Personal Identification Number Change Notice
CLI022L	Name Address Change Reminder
CLI023L	Statement of Certification

IBIS CORRESPONDENCE NUMBER	IBIS CORRESPONDENCE NAME
CLI001L	UI Finding
CLI002L	Combined Wage Information Letter
CLI004F	Work History for Incoming CWC Request Form
CLI004L	Determination of Entitlement to Trade Readjustment Allowances (TRA)
CLI005L	Notice of Deleted Claim
CLI006L	Dependent Turning 18 Years of Age
CLI007L	TRA Outreach Notice
CLI008F	TRA Claim Notice to Adversely Affected Employer
CLI008L	Determination of Entitlement to Emergency Unemployment Compensation (EUC08)
CLI009L	Place holder not documentation
CLI011F	Extended Benefits Work Search Record
CLI011L	Determination of Entitlement to Extended Benefits (EB)
CLI012F	TRA/UI Election Notice
CLI012L	Emergency Unemployment Compensation
CLI013F	TRA Employment Questionnaire
CLI013F(I)	Internet TRA Employment Questionnaire
CLI014F	Application for Completion TRA
GEN002L	Resent Correspondence Cover Letter

# Exhibit 4

Telephonic Interpreting Instruction Card

## Telephonic Interpreting Services

### Department of Employment Security I

Access Code: 3873

Dial: **1-844-297-8217**

#### Required information:

Your first name & initial of last name

Your work/office phone number

Your cost center

Language Codes indicated at:  
[LangaugeCodes.info](http://LangaugeCodes.info)

Back-up Service Line:  
**1-866-386-1284**

To be used if primary number is unavailable

Top Languages	
Spanish	1
Amharic	39
Arabic	23
Burmese	21
French	26
Haitian Creole	28
Karen	34
Kinyarwanda	94
Korean	30
Mandarin	24
Nepali	25
Russian	27
Somali	29
Swahili	38
Vietnamese	22
All Other	8
<a href="http://LanguageCodes.info">LanguageCodes.info</a>	

**Access Code** provides you access to interpreting services under the correct skill set (medical, legal or general) and accurate billing information per your organization's requests.

**Voice Recognition** is available to determine the target language. If you prefer to use a language code, you may find a complete list at [LanguageCodes.info](http://LanguageCodes.info).

**Billing Intake** is collected at the request of your organization. Please be prepared to provide this information accurately.

**For a third party dial out**, notify the first person who answers (interpreter/coordinator).

**Please note:** International calls are subject to additional fees. Please obtain approval from your internal management.

**Back-Up Service Line: 1-866-386-1284**

*To be used if primary number is unavailable.*

**Client Support: 1-888-528-6692**

or by dialing option 0 from your primary number.

**Telephonic Interpreter Scheduling** should be reserved for rare languages of limited diffusion. Inquiries may be sent to [ScheduledOPI@Propio-LS.com](mailto:ScheduledOPI@Propio-LS.com) or by dialing option 9 from your primary number.

### Rate Your Interpreter

At the end of the call, you may be asked to rate your interpreter on a scale of 1 to 5, 5 being the best. Our Interpreter Quality Team actively reviews these ratings to ensure our clients receive the best quality. We appreciate your feedback!

### Your Interpreter's Role

Your Interpreter should introduce himself/herself by first name and interpreter number. They are not required to provide a last name.

At no time are telephonic interpreters allowed to provide interpreting services for written documents or explanations without the caller or LEP verbally stating the content first. This is to ensure accuracy of services.

Interpreter should not have a side conversation with you or the client. He/she must relay all statements back to you or your client. This includes any advice that the client may ask of the interpreter. If the interpreter needs clarification, he/she may ask your permission to step out of the interpreter role to ask.

Your interpreter should not discuss anything unrelated to the telephone interpretation assignment.



## How to schedule a Telephonic Interpreter

**Scheduled calls should be reserved for languages of limited diffusion.**

Common languages such as Spanish, Arabic, Vietnamese, etc. are available on demand as you need them; therefore, there is no need to pre-schedule.

**Requests must be submitted by 4:00 pm CST the business day prior to the requested scheduled date.**

This ensures the scheduling team adequate time to reach out to available resources and secure an interpreter. Please note; rare languages are encouraged to provide a 48-hour notice due to limited availability. Requests received beyond this specified time will be directed to our on-demand services.

**The minimum charge is the greater of 30-minutes or the requested duration (estimated time) for interpreter services at the normal rate per minute for on-demand services.**

This ensures the interpreter is compensated for setting aside the specific amount of time from other opportunities. It is important to give an accurate estimation of time needed for interpreting services to ensure the interpreter's availability, as other scheduled assignments must be considered.

### How to pre-schedule a telephonic interpreter:

Send your request by email [ScheduledOPI@Propio-LS.com](mailto:ScheduledOPI@Propio-LS.com) or call the interpreter line indicated on your instruction card and select option 9. Provide the following information:

- 4-digit access number & name of organization
- Requested date and start time (including time zone)
- Language
- Billing intake information as indicated on your instruction card
- The caller's contact information (name, phone number & email address)
- Estimated length of scheduled call
- Indicate if a third party dial out will be needed

An acknowledgement email will be sent to the original requester with the job reference number within 1 business day. A confirmation email will be sent to the original requester once the interpreter has been secured.

The scheduling team will continue to fulfil the request until either the interpreter is secured or the request is cancelled. The client assumes the interpreter has not been secured unless confirmation is received. Acknowledgements and confirmations should be reviewed for accuracy upon receipt. Any revisions should be reported immediately to avoid delay in services.

## How to request Translation Service

Propio's Translation team is able to assist you and your staff with any translation needs you have for over 125 languages! Translation requests are typically completed within 3-5 business days. Jobs requiring a faster completion date may be subject to a rush fee.

For a quote, please send your request to [Translate@Propio-LS.com](mailto:Translate@Propio-LS.com). You will need to provide the following:

- 4-digit access number & name of organization
- Editable format of your source document (Word, Publisher, etc.)
- Indicate the target language(s)
- Indicate if desktop publishing (formatting) is needed (additional fee)
- Indicate the expected deadline (additional rush fee may apply)

A quote will be provided for approval within 24 hours. Typically a request can be processed within 2-3 business days depending on the size and formatting needs of the source document.

**Please note:** Translation services may not be provided under your contract. While Propio is more than happy to provide this service as an adhoc request, please obtain approval from your internal management before providing final approval to Propio to process a project request.



# Exhibit 5

Identification of Language Poster

# IF YOU NEED A FREE INTERPRETER, PLEASE POINT TO YOUR LANGUAGE



<b>Amharic: አማርኛ</b> አስተርጓዹ ቤት የሚፈልጉት ሲሆን: አበበዎን ቅጂዎች ላይ, የመልከት	<b>Arabic: عربی</b> إذا كنت في حاجة إلى مترجم مجاناً، أشر إلى اللغة المطلوبة
<b>Bosnian: Bosanski</b> Ako vam je potreban besplatni prevodilac, pokažite na svoj jezik	<b>Chin: Baungshe</b> Holhleh piak tu na herh asi ah cun, zaangfahnak tein na holh kha rak kan chim ta.
<b>Chin: Baungshe</b> Holhleh piak tu na herh asi ah cun, zaangfahnak tein na holh kha rak kan chim ta.	<b>French: Français</b> Si vous avez besoin de l'assistance gratuite d'un interprète, indiquez votre langue.
<b>Greek: Ελληνικά</b> Αν χρειάζεστε έναν ελεύθερο διερμηνέα, παρακαλώ δείξτε τη γλώσσα σας	<b>Gujarati: ગુજરાતી</b> જો તમારે નિઃશ્વાસ અનુવાદકની જરૂર હોય તો તમારી ભાષા તરફ ચીધો.
<b>Hindi: हिन्दी</b> यदि आपको एक सफ़त भाषा अनुवादक की आवश्यकता हो, तो कृपया अपनी भाषा की ओर इशारा करें	<b>Hmong: Hmoob</b> Yog koj xav tau tus kws pab txais lus pub dawb, thov qhia koj hom lus.
<b>Hungarian: Magyarul ayisen</b> Ha ingyenes tolmacsra van szüksége, nézze meg a saját nyelvét.	<b>Italian: Italiano</b> Se avete bisogno di un interprete gratuito, indicate la vostra lingua
<b>Japanese: 日本語</b> 無料の通訳が必要な場合は、言語を指示してください	<b>Karen: unD</b> နှမူလိုဘာရှိယာကတီကိုရှိတ်ကလိန်, ဝံသာရှိနိုင်ချုံ နကျိုကိုအလိုတကု့။
<b>Karenni: ကရောင်းသွေး</b> အမှုပြု စွဲ ပြုဆောင် အသေးစိတ်ပြုပေးမှုများ မျှော်ဖြော်ပွဲပြု ပုံစံများ ပျော်ဆောင် ပျော်ဆောင် ပျော်ဆောင် ပျော်ဆောင်	<b>Khmer: ភាសាខ្មែរ</b> ដើម្បីស្ថាប័នមួយតំបន់ទំនាក់ទំនង ការប្រព័ន្ធប្រជាពលរដ្ឋ និងការប្រព័ន្ធប្រជាធិបតេយ្យ និងការប្រព័ន្ធប្រជាធិបតេយ្យ និងការប្រព័ន្ធប្រជាធិបតេយ្យ
<b>Kirundi: Rundi</b> Niwoba ukeneye umusobanuzi wa gusa, fyonda ahanditse ururimi rwawe	<b>Korean: 한국어</b> 무료로 통역자가 필요한시면 사용하는시는 언어를 지적해주세요.
<b>Nepali: नेपाली</b> यदि तपाईंलाई निःशुल्क दोभाषे चाहिएमा, कृपया आफ्नो भाषामा देखाउनुहोस्	<b>Norwegian: Norsk</b> Hvis du trenger en gratis tolk, kan du peke på landet ditt.
<b>Polish: Polski</b> Jeśli potrzebujesz bezpłatnej usługi tłumacza, wskaż swój język.	<b>Portuguese: Português</b> Se precisa de um intérprete gratuito, aponte para seu idioma
<b>Punjabi: ਪੰਜਾਬੀ</b> ਜੇ ਤੁਹਾਨੂੰ ਇੱਕ ਮੁਫ਼ਤ ਢੁਕਾਈਦੇ ਦੀ ਲੋੜ ਹੈ, ਤਾਂ ਕਿਰਪਾ ਕਰਕੇ ਆਪਣੀ ਭਾਸ਼ਾ ਵੱਲ ਸੰਕੇਤ ਕਰੋ	<b>Romanian: Română</b> Dacă aveți nevoie de asistență gratuită din partea unui interlocutor, vă rugăm indicați limba dvs.
<b>Russian: Русский</b> Если вам нужен бесплатный переводчик, выберите ваш язык.	<b>Serbian: Српски</b> Ако вам је потребан бесплатни преводилац, покажите на свој језик
<b>Simplified Mandarin: 简体中文</b> 如果您需要译员, 请指向您的语言	<b>Somali: Soomaali</b> Haddaad u baahan tahay turjumaan bilaash ah, fadlan tilmaamo luqadaada.
<b>Spanish: Español</b> Si necesitas un intérprete gratuito, por favor selecciona tu idioma respectivo.	<b>Swahili: Kiswahili</b> Ikiwa unahtaji mkalimani bila malipo, tafadhali onyesha lugha yako.
<b>Swedish: Svenska</b> Om ni behöver tolk kostnadsfritt, var god ange ert språk.	<b>Tagalog: Tagalog</b> Kung kailangan niyo ng libreng interpreter o tagasalin, ituro ang inyong wika
<b>Tamil: தமிழ்</b> இலவச மொழிப்பொயர்ப்பு தேவையில், தங்களின் மொழியைக் குறிப்பிடவும்.	<b>Thai: ภาษาไทย</b> หากคุณต้องการล่ามฟรี กรุณาชี้ไปที่ภาษาของคุณ
<b>Tigirigma: തിംഗി</b> ഈ അപ്രകാരം തുടരുന്നതും അല്ലെങ്കിൽ അപ്രകാരം അല്ലെങ്കിൽ അല്ലെങ്കിൽ	<b>Traditional Mandarin: 繁体中文</b> 如果您需要譯員, 請指向您的語言
<b>Vietnamese: tiếng việt</b> Nếu quý vị cần thông dịch viên miễn phí, vui lòng trả vào ngôn ngữ của quý	<b>Urdu: اردو</b> اگر آپ کو ایک مفت مترجم در کار ہے، براہ کرم اپنی زبان بتائیں۔

	Simplified Chinese	Traditional Chinese
<b>Cantonese</b>	粤语	粵語
<b>Chaochow</b>	潮州话	潮州話
<b>Fukienese</b>	福建话	福建話
<b>Fuzhou</b>	福州话	福州話
<b>Mandarin</b>	普通话	國語
<b>Shanghai</b>	上海话	上海話
<b>Taiwanese</b>	台湾话	台語
<b>Toishanese</b>	台山话	台山話
<b>Ning Po</b>	宁波话	寧波話

**propio** language services

[www.propio-ls.com](http://www.propio-ls.com)

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# Exhibit 6

IDES Equal Opportunity Language Access  
Complaint Forms, English and Spanish



**FORM FOR DISCRIMINATION COMPLAINTS BY IDES CLIENTS  
AND THE GENERAL PUBLIC AGAINST IDES AND/OR IDES EMPLOYEES**

You should use this form if you are a client of the Illinois Department of Employment Security (IDES) or a member of the general public who wants to file a discrimination complaint against IDES and/or IDES employees with the IDES Office of Equal Employment Opportunity/Affirmative Action. (This form is **not** for use by IDES employees. They should use IDES Internal Complaint Form EEO-2.) If you prefer, you may file your complaint directly with the U.S. Department of Labor/Civil Rights Center by completing and forwarding federal complaint form DL-12014a to: U.S. Department of Labor, Civil Rights Center, 200 Constitution Avenue N.W., Room N-4123, Washington D.C., 20210. Form DL-12014a may be obtained at any IDES local office.

## 1. Information About You

<b>Your Name and Address:</b>		<b>Your Telephone Number(s):</b>	
<hr/> Name		Home: ( _____ )	
<hr/> Address		Area Code Number	
<hr/> City		State	ZIP
Alternate: ( _____ )			
Area Code Number			
What is the most convenient time for us to contact you?			
<hr/>			

## 2. Information About Your Complaint

<p>Please identify the IDES office (or other location) where the incident(s) you are complaining about occurred:</p> <hr/> <hr/> <hr/> <hr/> <hr/>	<p>Please identify as best you can the IDES employee(s) and/or other person(s) involved in the incident(s) you are complaining about:</p> <hr/> <hr/> <hr/> <hr/> <hr/>	<p>Please identify the time(s) and date(s) when the incident(s) you are complaining about occurred:</p> <hr/> <hr/> <hr/> <hr/> <hr/>
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**3.** Please briefly and clearly describe what happened and explain why you believe discrimination occurred. Be sure to include such information as: who was involved and what they did and/or said, including any offensive or derogatory language used; what was done and how the treatment differed, if you feel that you, or another, were treated differently than others, etc. Please attach any written material you have pertaining to your complaint.

State of Illinois  
Department of Employment Security  
Office of Equal Employment Opportunity/Affirmative Action  
**External Discrimination Complaint Form**



**4. Please provide us with any other information you think is important to your complaint.**


**5. What do you want IDES to do to resolve your complaint or remedy the discrimination you believe occurred?**


**6. Please list any persons (witnesses or others) we may contact for additional information about your complaint.**

Name	Address	Telephone

**7. Basis of Complaint:** Which of the following types of discrimination best describes the discrimination you believe occurred?

<input type="checkbox"/> Race: (Specify): _____	<input type="checkbox"/> Sex: Male   Female	<input type="checkbox"/> Disability
<input type="checkbox"/> Color: (Specify): _____	<input type="checkbox"/> Age: (Specify): _____	<input type="checkbox"/> Retaliation
<input type="checkbox"/> Religion (Specify): _____	<input type="checkbox"/> National Origin (Specify): _____	<input type="checkbox"/> Sexual Harassment
<input type="checkbox"/> Marital Status: _____	<input type="checkbox"/> Language Access (Specify): _____	<input type="checkbox"/> Other (Specify): _____

Complainant's Signature \_\_\_\_\_ Date \_\_\_\_\_

Please complete this form and return it with copies of supporting documentation to the IDES Office of Equal Employment Opportunity/Affirmative Action, 115 S. LaSalle Street, 17th Floor, Chicago, IL 60603. Fax (312.793.0302). If you have questions, our telephone numbers are: 312.793.9290, TTY 888-340-1007.

**FOR EEO/AA OFFICE USE ONLY:**

EEO Case Number Assigned: \_\_\_\_\_  Service Complaint referred to: \_\_\_\_\_

Received by: \_\_\_\_\_ Date \_\_\_\_\_



**FORMULARIO PARA LAS QUEJAS DE DISCRIMINACIÓN POR PARTE DE LOS CLIENTES DEL IDES  
Y EL PÚBLICO EN GENERAL EN CONTRA DEL IDES O LOS EMPLEADOS DEL IDES**

Usted debería usar este formulario si es un cliente del Departamento de Seguridad del Empleo de Illinois (IDES) o miembro del público en general, que desea presentar una queja de discriminación en contra del IDES y/o empleados del IDES ante la Oficina de Igualdad de Oportunidad de Empleo/Acción Afirmativa del IDES. (Este formulario **no** puede ser usado por los empleados del IDES. Ellos deberían usar el Formulario de Queja Interna del IDES EEO-2.) Si lo prefiere, puede presentar su queja directamente al Departamento del Trabajo de los Estados Unidos/Centro de Derechos Civiles al completar y enviar el formulario federal DL-12014a al: U.S. Department of Labor, Civil Rights Center, 200 Constitution Avenue N.W., Room N-4123, Washington D.C., 20210. El Formulario DL-12014a se puede obtener en cualquier oficina local del IDES.

**1. Información Acerca de Usted**

<b>Su Nombre y Dirección:</b>  Nombre _____  Dirección _____  Ciudad _____ Estado _____ Código Postal _____	<b>Su(s) Número(s) Telefónico(s):</b>  Hogar: (_____) _____ Código de Área _____ Número _____  Alternativo: (_____) _____ Código de Área _____ Número _____  ¿Cuál es la hora más adecuada para contactarle? _____
---	---

**2. Información Acerca de su Queja**

Por favor, identifique la oficina del IDES (u otro lugar) donde ocurrió el incidente o incidentes de los cuales se está quejando: _____ _____ _____ _____ _____	Por favor, identifique en lo mejor que pueda al empleado o empleados del IDES y/u otras personas involucradas en el o los incidentes de los cuales se está quejando: _____ _____ _____ _____ _____	Por favor, identifique las horas y las fechas cuando ocurrió el incidente o incidentes de los cuales se está quejando: _____ _____ _____ _____ _____
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**3. Por favor, describa claramente y brevemente lo que sucedió, y explique por qué cree que la discriminación ocurrió.**  
Asegúrese de incluir información como: quién estaba involucrado, y qué hicieron o dijeron las personas o persona, incluyendo cualquier lenguaje ofensivo o derogatorio; qué se hizo y cómo el tratamiento fue diferente, si piensa que usted u otra persona fue tratado de manera distinta que otros, etc. Por favor, anexe cualquier material escrito que tenga y que esté relacionado con su queja.

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Estado de Illinois  
Departamento de Seguridad del Empleo  
Oficina de Igualdad de Oportunidad de Empleo/Acción Afirmativa  
**Formulario De Queja de Discriminación Externa**



4. Por favor, provéanos cualquier otra información que crea es importante para su queja.


5. ¿Qué desea que IDES haga para resolver su queja o remediar la discriminación que cree ocurrió?


6. Por favor, mencione a cualquier persona (testigos u otros) que podamos contactar para obtener información acerca de su queja.

Nombre	Dirección	Teléfono

7. **Base de la Queja:** ¿Cuál de los siguientes tipos de discriminación describe mejor la discriminación que usted cree ocurrió?

<input type="checkbox"/> Raza: (Especifique): _____	<input type="checkbox"/> Sexo: <input type="radio"/> Masculino <input type="radio"/> Femenino <input type="checkbox"/> Incapacidad
<input type="checkbox"/> Color: (Especifique): _____	<input type="checkbox"/> Edad: (Especifique): _____ <input type="checkbox"/> Retaliación
<input type="checkbox"/> Religión (Especifique): _____	<input type="checkbox"/> Nacionalidad (Especifique): _____ <input type="checkbox"/> Acoso Sexual
<input type="checkbox"/> Estado Civil: _____	<input type="checkbox"/> Otro (Especifique): _____

Firma del Querellante

Fecha

Por favor, complete el formulario y regréselo con copias de los documentos que lo soporten a: IDES Office of Equal Employment Opportunity/Affirmative Action, 115 S. LaSalle Street, 17th Floor, Chicago, IL 60603. Fax (312.793.0302). Si tiene alguna pregunta, nuestros números telefónicos son: 312.793.9290, TTY 888-340-1007.

FOR EEO/AA OFFICE USE ONLY:

EEO Case Number Assigned: \_\_\_\_\_  Service Complaint referred to: \_\_\_\_\_

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

# Exhibit 7

Data on English Proficiency by Illinois County

English proficiency of Adams County households			
Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	26,674	0	0.0%
Spanish	472	47	0.2%
European (excl Spanish)	219	0	0.0%
Russian / Slavic	43	0	0.0%
Asian (all)	296	6	0.0%
Arabic (all)	28	18	0.1%
All other	38	0	0.0%

English proficiency of Alexander County households			
Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	1,816	0	0.0%
Spanish	9	0	0.0%
European (excl Spanish)	0	0	0.0%
Russian / Slavic	0	0	0.0%
Asian (all)	1	0	0.0%
Arabic (all)	0	0	0.0%
All other	0	0	0.0%

English proficiency of Bond County households			
Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	6,057	0	0.0%
Spanish	143	0	0.0%
European (excl Spanish)	39	1	0.0%
Russian / Slavic	9	0	0.0%
Asian (all)	8	0	0.0%
Arabic (all)	0	0	0.0%
All other	0	0	0.0%

English proficiency of Boone County households			
Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	15,483	0	0.0%
Spanish	2,990	515	2.7%
European (excl Spanish)	170	0	0.0%
Russian / Slavic	204	26	0.1%
Asian (all)	181	57	0.3%
Arabic (all)	106	0	0.0%
All other	21	0	0.0%

English proficiency of Brown County households			
Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	1,991	0	0.0%
Spanish	11	0	0.0%
European (excl Spanish)	19	3	0.1%
Russian / Slavic	0	0	0.0%
Asian (all)	0	0	0.0%
Arabic (all)	0	0	0.0%
All other	0	0	0.0%

English proficiency of Bureau County households			
Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	13,004	0	0.0%
Spanish	695	94	0.7%
European (excl Spanish)	181	11	0.1%
Russian / Slavic	21	0	0.0%
Asian (all)	100	4	0.0%
Arabic (all)	9	0	0.0%
All other	1	0	0.0%

### English proficiency of Calhoun County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	1,196	0	0.0%
Spanish	7	0	0.0%
European (excl Spanish)	18	0	0.0%
Russian / Slavic	0	0	0.0%
Asian (all)	1	0	0.0%
Arabic (all)	0	0	0.0%
All other	0	0	0.0%

### English proficiency of Carroll County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	6,192	0	0.0%
Spanish	125	0	0.0%
European (excl Spanish)	122	12	0.2%
Russian / Slavic	18	0	0.0%
Asian (all)	16	0	0.0%
Arabic (all)	2	0	0.0%
All other	3	0	0.0%

### English proficiency of Cass County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	4,249	0	0.0%
Spanish	704	294	5.7%
European (excl Spanish)	92	53	1.0%
Russian / Slavic	7	0	0.0%
Asian (all)	65	35	0.7%
Arabic (all)	0	0	0.0%
All other	18	18	0.4%

### English proficiency of Champaign County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	65,515	0	0.0%
Spanish	5,032	1,003	1.2%
European (excl Spanish)	4,344	856	1.0%
Russian / Slavic	694	75	0.1%
Asian (all)	7,112	2,416	2.9%
Arabic (all)	379	41	0.0%
All other	701	91	0.1%

### English proficiency of Christian County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	13,289	0	0.0%
Spanish	78	0	0.0%
European (excl Spanish)	117	10	0.1%
Russian / Slavic	0	0	0.0%
Asian (all)	48	1	0.0%
Arabic (all)	0	0	0.0%
All other	2	0	0.0%

### English proficiency of Clark County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	6,354	0	0.0%
Spanish	135	12	0.2%
European (excl Spanish)	79	0	0.0%
Russian / Slavic	14	0	0.0%
Asian (all)	15	0	0.0%
Arabic (all)	0	0	0.0%
All other	0	0	0.0%

English proficiency of Clay County households			
Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	5,392	0	0.0%
Spanish	26	0	0.0%
European (excl Spanish)	2	0	0.0%
Russian / Slavic	0	0	0.0%
Asian (all)	11	9	0.2%
Arabic (all)	0	0	0.0%
All other	0	0	0.0%

English proficiency of Clinton County households			
Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	13,838	0	0.0%
Spanish	288	34	0.2%
European (excl Spanish)	151	20	0.1%
Russian / Slavic	23	0	0.0%
Asian (all)	90	3	0.0%
Arabic (all)	0	0	0.0%
All other	73	73	0.5%

English proficiency of Coles County households			
Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	19,390	0	0.0%
Spanish	346	17	0.1%
European (excl Spanish)	390	35	0.2%
Russian / Slavic	39	0	0.0%
Asian (all)	101	61	0.3%
Arabic (all)	0	0	0.0%
All other	69	0	0.0%

English proficiency of Cook County households		Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
Dual-Language Households	Number of Households		
English Only	1,356,392	0	0.0%
Spanish	384,471	74,966	3.6%
European (excl Spanish)	101,460	12,617	0.6%
Russian / Slavic	100,116	30,840	1.5%
Asian (all)	99,025	24,110	1.2%
Arabic (all)	19,489	3,007	0.1%
All other	23,625	3,689	0.2%

English proficiency of Crawford County households		Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
Dual-Language Households	Number of Households		
English Only	7,183	0	0.0%
Spanish	159	6	0.1%
European (excl Spanish)	37	0	0.0%
Russian / Slavic	24	0	0.0%
Asian (all)	6	0	0.0%
Arabic (all)	0	0	0.0%
All other	2	0	0.0%

English proficiency of Cumberland County households		Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
Dual-Language Households	Number of Households		
English Only	4,136	0	0.0%
Spanish	12	4	0.1%
European (excl Spanish)	17	11	0.3%
Russian / Slavic	6	0	0.0%
Asian (all)	9	0	0.0%
Arabic (all)	0	0	0.0%
All other	0	0	0.0%

English proficiency of DeKalb County households			
Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	33,934	0	0.0%
Spanish	2,993	651	1.7%
European (excl Spanish)	807	15	0.0%
Russian / Slavic	454	90	0.2%
Asian (all)	579	129	0.3%
Arabic (all)	464	88	0.2%
All other	83	0	0.0%

English proficiency of De Witt County households			
Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	6,441	0	0.0%
Spanish	160	0	0.0%
European (excl Spanish)	26	0	0.0%
Russian / Slavic	10	0	0.0%
Asian (all)	5	4	0.1%
Arabic (all)	0	0	0.0%
All other	0	0	0.0%

English proficiency of Douglas County households			
Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	6,465	0	0.0%
Spanish	481	66	0.8%
European (excl Spanish)	790	115	1.5%
Russian / Slavic	33	21	0.3%
Asian (all)	52	20	0.3%
Arabic (all)	0	0	0.0%
All other	0	0	0.0%

English proficiency of DuPage County households			
Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	243,900	0	0.0%
Spanish	38,247	5,563	1.6%
European (excl Spanish)	28,507	3,583	1.0%
Russian / Slavic	14,728	3,651	1.0%
Asian (all)	19,665	3,613	1.0%
Arabic (all)	2,585	250	0.1%
All other	1,865	433	0.1%

English proficiency of Edgar County households			
Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	7,380	0	0.0%
Spanish	90	2	0.0%
European (excl Spanish)	87	0	0.0%
Russian / Slavic	7	0	0.0%
Asian (all)	48	0	0.0%
Arabic (all)	0	0	0.0%
All other	0	0	0.0%

English proficiency of Edwards County households			
Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	2,566	0	0.0%
Spanish	49	21	0.8%
European (excl Spanish)	29	5	0.2%
Russian / Slavic	0	0	0.0%
Asian (all)	9	9	0.3%
Arabic (all)	0	0	0.0%
All other	0	0	0.0%

English proficiency of Effingham County households			
Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	13,451	0	0.0%
Spanish	406	97	0.7%
European (excl Spanish)	127	13	0.1%
Russian / Slavic	18	0	0.0%
Asian (all)	28	0	0.0%
Arabic (all)	0	0	0.0%
All other	0	0	0.0%

English proficiency of Fayette County households			
Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	7,463	0	0.0%
Spanish	158	13	0.2%
European (excl Spanish)	118	10	0.1%
Russian / Slavic	18	0	0.0%
Asian (all)	43	19	0.2%
Arabic (all)	2	0	0.0%
All other	30	0	0.0%

English proficiency of Ford County households			
Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	5,497	0	0.0%
Spanish	157	17	0.3%
European (excl Spanish)	49	0	0.0%
Russian / Slavic	8	0	0.0%
Asian (all)	16	12	0.2%
Arabic (all)	0	0	0.0%
All other	1	0	0.0%

### English proficiency of Franklin County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	15,575	0	0.0%
Spanish	246	45	0.3%
European (excl Spanish)	241	0	0.0%
Russian / Slavic	18	2	0.0%
Asian (all)	33	16	0.1%
Arabic (all)	6	0	0.0%
All other	11	0	0.0%

### English proficiency of Fulton County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	13,608	0	0.0%
Spanish	141	0	0.0%
European (excl Spanish)	75	3	0.0%
Russian / Slavic	12	0	0.0%
Asian (all)	62	0	0.0%
Arabic (all)	0	0	0.0%
All other	4	0	0.0%

### English proficiency of Gallatin County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	2,067	0	0.0%
Spanish	10	0	0.0%
European (excl Spanish)	6	0	0.0%
Russian / Slavic	0	0	0.0%
Asian (all)	3	0	0.0%
Arabic (all)	6	0	0.0%
All other	4	0	0.0%

English proficiency of Greene County households			
Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	4,441	0	0.0%
Spanish	56	2	0.0%
European (excl Spanish)	14	1	0.0%
Russian / Slavic	2	0	0.0%
Asian (all)	0	0	0.0%
Arabic (all)	0	0	0.0%
All other	1	0	0.0%

English proficiency of Grundy County households			
Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	18,382	0	0.0%
Spanish	1,432	50	0.2%
European (excl Spanish)	347	0	0.0%
Russian / Slavic	67	0	0.0%
Asian (all)	249	0	0.0%
Arabic (all)	37	0	0.0%
All other	4	0	0.0%

English proficiency of Hamilton County households			
Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	3,280	0	0.0%
Spanish	11	0	0.0%
European (excl Spanish)	32	0	0.0%
Russian / Slavic	23	0	0.0%
Asian (all)	4	4	0.1%
Arabic (all)	0	0	0.0%
All other	0	0	0.0%

English proficiency of Hancock County households			
Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	7,254	0	0.0%
Spanish	138	3	0.0%
European (excl Spanish)	63	0	0.0%
Russian / Slavic	4	0	0.0%
Asian (all)	49	1	0.0%
Arabic (all)	0	0	0.0%
All other	7	1	0.0%

English proficiency of Hardin County households			
Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	1,482	0	0.0%
Spanish	2	0	0.0%
European (excl Spanish)	0	0	0.0%
Russian / Slavic	0	0	0.0%
Asian (all)	0	0	0.0%
Arabic (all)	0	0	0.0%
All other	0	0	0.0%

English proficiency of Henderson County households			
Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	2,622	0	0.0%
Spanish	12	0	0.0%
European (excl Spanish)	10	0	0.0%
Russian / Slavic	0	0	0.0%
Asian (all)	2	0	0.0%
Arabic (all)	0	0	0.0%
All other	16	0	0.0%

English proficiency of Henry County households			
Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	19,291	0	0.0%
Spanish	754	133	0.7%
European (excl Spanish)	130	6	0.0%
Russian / Slavic	10	0	0.0%
Asian (all)	42	0	0.0%
Arabic (all)	0	0	0.0%
All other	34	3	0.0%

English proficiency of Iroquois County households			
Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	10,607	0	0.0%
Spanish	550	100	0.9%
European (excl Spanish)	82	3	0.0%
Russian / Slavic	1	0	0.0%
Asian (all)	93	3	0.0%
Arabic (all)	0	0	0.0%
All other	0	0	0.0%

English proficiency of Jackson County households			
Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	20,605	0	0.0%
Spanish	996	78	0.3%
European (excl Spanish)	708	158	0.7%
Russian / Slavic	42	2	0.0%
Asian (all)	451	91	0.4%
Arabic (all)	232	7	0.0%
All other	54	0	0.0%

English proficiency of Jasper County households			
Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	3,687	0	0.0%
Spanish	65	0	0.0%
European (excl Spanish)	11	1	0.0%
Russian / Slavic	0	0	0.0%
Asian (all)	3	0	0.0%
Arabic (all)	0	0	0.0%
All other	0	0	0.0%

English proficiency of Jefferson County households			
Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	14,230	0	0.0%
Spanish	195	5	0.0%
European (excl Spanish)	202	72	0.5%
Russian / Slavic	23	4	0.0%
Asian (all)	127	22	0.1%
Arabic (all)	23	0	0.0%
All other	5	0	0.0%

English proficiency of Jersey County households			
Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	7,840	0	0.0%
Spanish	111	5	0.1%
European (excl Spanish)	30	0	0.0%
Russian / Slavic	0	0	0.0%
Asian (all)	3	0	0.0%
Arabic (all)	0	0	0.0%
All other	0	0	0.0%

English proficiency of Jo Daviess County households			
Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	10,001	0	0.0%
Spanish	206	6	0.1%
European (excl Spanish)	96	12	0.1%
Russian / Slavic	21	0	0.0%
Asian (all)	55	4	0.0%
Arabic (all)	6	3	0.0%
All other	0	0	0.0%

English proficiency of Johnson County households			
Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	3,995	0	0.0%
Spanish	100	0	0.0%
European (excl Spanish)	29	6	0.1%
Russian / Slavic	0	0	0.0%
Asian (all)	9	0	0.0%
Arabic (all)	0	0	0.0%
All other	0	0	0.0%

English proficiency of Kane County households			
Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	127,776	0	0.0%
Spanish	42,384	5,704	3.1%
European (excl Spanish)	5,186	484	0.3%
Russian / Slavic	2,817	519	0.3%
Asian (all)	3,925	425	0.2%
Arabic (all)	447	13	0.0%
All other	661	54	0.0%

### English proficiency of Kankakee County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	35,933	0	0.0%
Spanish	4,040	475	1.2%
European (excl Spanish)	519	93	0.2%
Russian / Slavic	86	2	0.0%
Asian (all)	203	29	0.1%
Arabic (all)	46	1	0.0%
All other	68	0	0.0%

### English proficiency of Kendall County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	34,403	0	0.0%
Spanish	6,731	344	0.8%
European (excl Spanish)	1,383	69	0.2%
Russian / Slavic	529	45	0.1%
Asian (all)	1,022	57	0.1%
Arabic (all)	82	0	0.0%
All other	376	38	0.1%

### English proficiency of Knox County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	19,557	0	0.0%
Spanish	684	159	0.8%
European (excl Spanish)	349	70	0.3%
Russian / Slavic	16	0	0.0%
Asian (all)	100	25	0.1%
Arabic (all)	0	0	0.0%
All other	59	25	0.1%

### English proficiency of Lake County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	174,875	0	0.0%
Spanish	44,832	8,106	3.2%
European (excl Spanish)	11,687	674	0.3%
Russian / Slavic	9,003	2,007	0.8%
Asian (all)	14,442	2,172	0.8%
Arabic (all)	511	56	0.0%
All other	1,310	92	0.0%

### English proficiency of LaSalle County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	41,187	0	0.0%
Spanish	2,522	512	1.1%
European (excl Spanish)	773	26	0.1%
Russian / Slavic	220	30	0.1%
Asian (all)	328	70	0.2%
Arabic (all)	2	0	0.0%
All other	60	0	0.0%

### English proficiency of Lawrence County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	5,237	0	0.0%
Spanish	131	13	0.2%
European (excl Spanish)	23	9	0.2%
Russian / Slavic	0	0	0.0%
Asian (all)	21	8	0.1%
Arabic (all)	0	0	0.0%
All other	2	0	0.0%

### English proficiency of Lee County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	12,607	0	0.0%
Spanish	540	115	0.9%
European (excl Spanish)	89	9	0.1%
Russian / Slavic	45	0	0.0%
Asian (all)	87	2	0.0%
Arabic (all)	14	0	0.0%
All other	0	0	0.0%

### English proficiency of Livingston County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	13,977	0	0.0%
Spanish	394	59	0.4%
European (excl Spanish)	144	4	0.0%
Russian / Slavic	63	5	0.0%
Asian (all)	35	0	0.0%
Arabic (all)	1	0	0.0%
All other	0	0	0.0%

### English proficiency of Logan County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	10,836	0	0.0%
Spanish	187	0	0.0%
European (excl Spanish)	70	0	0.0%
Russian / Slavic	1	0	0.0%
Asian (all)	21	7	0.1%
Arabic (all)	0	0	0.0%
All other	7	7	0.1%

### English proficiency of McDonough County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	11,033	0	0.0%
Spanish	304	52	0.4%
European (excl Spanish)	245	85	0.7%
Russian / Slavic	3	0	0.0%
Asian (all)	103	6	0.1%
Arabic (all)	0	0	0.0%
All other	72	15	0.1%

### English proficiency of McHenry County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	96,840	0	0.0%
Spanish	11,550	907	0.8%
European (excl Spanish)	2,854	230	0.2%
Russian / Slavic	2,657	469	0.4%
Asian (all)	1,985	198	0.2%
Arabic (all)	148	0	0.0%
All other	295	0	0.0%

### English proficiency of McLean County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	62,544	0	0.0%
Spanish	2,304	155	0.2%
European (excl Spanish)	1,595	176	0.3%
Russian / Slavic	258	0	0.0%
Asian (all)	1,935	363	0.5%
Arabic (all)	255	0	0.0%
All other	181	17	0.0%

### English proficiency of Macon County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	41,570	0	0.0%
Spanish	797	57	0.1%
European (excl Spanish)	354	23	0.1%
Russian / Slavic	107	0	0.0%
Asian (all)	368	152	0.4%
Arabic (all)	46	0	0.0%
All other	92	6	0.0%

### English proficiency of Macoupin County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	17,122	0	0.0%
Spanish	158	31	0.2%
European (excl Spanish)	78	0	0.0%
Russian / Slavic	23	4	0.0%
Asian (all)	50	20	0.1%
Arabic (all)	0	0	0.0%
All other	0	0	0.0%

### English proficiency of Madison County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	104,170	0	0.0%
Spanish	2,933	396	0.4%
European (excl Spanish)	873	25	0.0%
Russian / Slavic	274	26	0.0%
Asian (all)	751	148	0.1%
Arabic (all)	43	0	0.0%
All other	341	46	0.0%

### English proficiency of Marion County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	14,930	0	0.0%
Spanish	314	65	0.4%
European (excl Spanish)	70	8	0.1%
Russian / Slavic	39	9	0.1%
Asian (all)	69	18	0.1%
Arabic (all)	30	0	0.0%
All other	13	0	0.0%

### English proficiency of Marshall County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	4,775	0	0.0%
Spanish	135	31	0.6%
European (excl Spanish)	39	8	0.2%
Russian / Slavic	5	0	0.0%
Asian (all)	4	0	0.0%
Arabic (all)	5	0	0.0%
All other	1	0	0.0%

### English proficiency of Mason County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	5,582	0	0.0%
Spanish	97	0	0.0%
European (excl Spanish)	29	0	0.0%
Russian / Slavic	0	0	0.0%
Asian (all)	6	0	0.0%
Arabic (all)	0	0	0.0%
All other	0	0	0.0%

### English proficiency of Massac County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	5,309	0	0.0%
Spanish	121	25	0.5%
European (excl Spanish)	24	0	0.0%
Russian / Slavic	0	0	0.0%
Asian (all)	22	0	0.0%
Arabic (all)	6	0	0.0%
All other	0	0	0.0%

### English proficiency of Menard County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	5,069	0	0.0%
Spanish	35	0	0.0%
European (excl Spanish)	52	0	0.0%
Russian / Slavic	7	0	0.0%
Asian (all)	32	0	0.0%
Arabic (all)	0	0	0.0%
All other	0	0	0.0%

### English proficiency of Mercer County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	6,182	0	0.0%
Spanish	139	17	0.3%
European (excl Spanish)	6	0	0.0%
Russian / Slavic	21	10	0.2%
Asian (all)	30	0	0.0%
Arabic (all)	12	0	0.0%
All other	23	0	0.0%

### English proficiency of Monroe County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	13,397	0	0.0%
Spanish	239	5	0.0%
European (excl Spanish)	93	0	0.0%
Russian / Slavic	18	0	0.0%
Asian (all)	83	0	0.0%
Arabic (all)	0	0	0.0%
All other	0	0	0.0%

### English proficiency of Montgomery County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	10,862	0	0.0%
Spanish	193	0	0.0%
European (excl Spanish)	90	0	0.0%
Russian / Slavic	43	0	0.0%
Asian (all)	17	15	0.1%
Arabic (all)	0	0	0.0%
All other	60	2	0.0%

### English proficiency of Morgan County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	12,792	0	0.0%
Spanish	182	11	0.1%
European (excl Spanish)	90	0	0.0%
Russian / Slavic	11	0	0.0%
Asian (all)	39	0	0.0%
Arabic (all)	11	0	0.0%
All other	0	0	0.0%

### English proficiency of Moultrie County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	5,261	0	0.0%
Spanish	55	0	0.0%
European (excl Spanish)	492	24	0.4%
Russian / Slavic	0	0	0.0%
Asian (all)	14	0	0.0%
Arabic (all)	0	0	0.0%
All other	0	0	0.0%

### English proficiency of Ogle County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	18,836	0	0.0%
Spanish	1,372	244	1.2%
European (excl Spanish)	246	0	0.0%
Russian / Slavic	70	0	0.0%
Asian (all)	129	65	0.3%
Arabic (all)	41	0	0.0%
All other	1	0	0.0%

### English proficiency of Peoria County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	69,878	0	0.0%
Spanish	2,569	442	0.6%
European (excl Spanish)	1,598	81	0.1%
Russian / Slavic	201	0	0.0%
Asian (all)	2,120	362	0.5%
Arabic (all)	343	60	0.1%
All other	365	0	0.0%

### English proficiency of Perry County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	7,719	0	0.0%
Spanish	142	13	0.2%
European (excl Spanish)	99	32	0.4%
Russian / Slavic	16	0	0.0%
Asian (all)	18	17	0.2%
Arabic (all)	0	0	0.0%
All other	0	0	0.0%

### English proficiency of Piatt County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	6,603	0	0.0%
Spanish	125	0	0.0%
European (excl Spanish)	89	0	0.0%
Russian / Slavic	0	0	0.0%
Asian (all)	34	8	0.1%
Arabic (all)	0	0	0.0%
All other	0	0	0.0%

### English proficiency of Pike County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	5,682	0	0.0%
Spanish	55	8	0.1%
European (excl Spanish)	68	0	0.0%
Russian / Slavic	0	0	0.0%
Asian (all)	10	2	0.0%
Arabic (all)	0	0	0.0%
All other	0	0	0.0%

### English proficiency of Pope County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	1,346	0	0.0%
Spanish	12	0	0.0%
European (excl Spanish)	0	0	0.0%
Russian / Slavic	5	5	0.4%
Asian (all)	1	0	0.0%
Arabic (all)	0	0	0.0%
All other	0	0	0.0%

### English proficiency of Pulaski County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	1,844	0	0.0%
Spanish	2	0	0.0%
European (excl Spanish)	2	0	0.0%
Russian / Slavic	0	0	0.0%
Asian (all)	4	3	0.2%
Arabic (all)	10	10	0.5%
All other	0	0	0.0%

### English proficiency of Putnam County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	2,327	0	0.0%
Spanish	94	12	0.5%
European (excl Spanish)	25	0	0.0%
Russian / Slavic	18	0	0.0%
Asian (all)	9	0	0.0%
Arabic (all)	0	0	0.0%
All other	0	0	0.0%

### English proficiency of Randolph County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	11,274	0	0.0%
Spanish	139	38	0.3%
European (excl Spanish)	160	4	0.0%
Russian / Slavic	1	0	0.0%
Asian (all)	39	0	0.0%
Arabic (all)	3	0	0.0%
All other	55	35	0.3%

### English proficiency of Richland County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	6,154	0	0.0%
Spanish	113	16	0.2%
European (excl Spanish)	123	0	0.0%
Russian / Slavic	0	0	0.0%
Asian (all)	11	0	0.0%
Arabic (all)	0	0	0.0%
All other	0	0	0.0%

### English proficiency of Rock Island County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	53,689	0	0.0%
Spanish	4,209	522	0.9%
European (excl Spanish)	1,391	276	0.5%
Russian / Slavic	174	0	0.0%
Asian (all)	908	440	0.7%
Arabic (all)	119	82	0.1%
All other	702	248	0.4%

### English proficiency of St. Clair County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	94,473	0	0.0%
Spanish	3,709	206	0.2%
European (excl Spanish)	1,413	149	0.1%
Russian / Slavic	101	0	0.0%
Asian (all)	1,013	69	0.1%
Arabic (all)	341	16	0.0%
All other	223	0	0.0%

### English proficiency of Saline County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	9,841	0	0.0%
Spanish	109	31	0.3%
European (excl Spanish)	29	0	0.0%
Russian / Slavic	11	0	0.0%
Asian (all)	42	14	0.1%
Arabic (all)	0	0	0.0%
All other	0	0	0.0%

### English proficiency of Sangamon County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	79,822	0	0.0%
Spanish	1,603	131	0.2%
European (excl Spanish)	1,338	165	0.2%
Russian / Slavic	136	10	0.0%
Asian (all)	957	131	0.2%
Arabic (all)	172	15	0.0%
All other	262	0	0.0%

### English proficiency of Schuyler County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	2,650	0	0.0%
Spanish	24	1	0.0%
European (excl Spanish)	42	18	0.7%
Russian / Slavic	0	0	0.0%
Asian (all)	16	0	0.0%
Arabic (all)	0	0	0.0%
All other	0	0	0.0%

### English proficiency of Scott County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	1,989	0	0.0%
Spanish	21	0	0.0%
European (excl Spanish)	11	0	0.0%
Russian / Slavic	0	0	0.0%
Asian (all)	11	0	0.0%
Arabic (all)	0	0	0.0%
All other	0	0	0.0%

### English proficiency of Shelby County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	8,529	0	0.0%
Spanish	120	4	0.0%
European (excl Spanish)	21	0	0.0%
Russian / Slavic	110	0	0.0%
Asian (all)	14	0	0.0%
Arabic (all)	0	0	0.0%
All other	1	0	0.0%

### English proficiency of Stark County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	2,171	0	0.0%
Spanish	71	0	0.0%
European (excl Spanish)	9	0	0.0%
Russian / Slavic	19	0	0.0%
Asian (all)	12	0	0.0%
Arabic (all)	7	0	0.0%
All other	0	0	0.0%

### English proficiency of Stephenson County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	18,544	0	0.0%
Spanish	523	51	0.3%
European (excl Spanish)	226	0	0.0%
Russian / Slavic	83	32	0.2%
Asian (all)	87	0	0.0%
Arabic (all)	6	0	0.0%
All other	0	0	0.0%

### English proficiency of Tazewell County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	52,234	0	0.0%
Spanish	679	57	0.1%
European (excl Spanish)	441	15	0.0%
Russian / Slavic	41	0	0.0%
Asian (all)	319	13	0.0%
Arabic (all)	9	0	0.0%
All other	89	0	0.0%

### English proficiency of Union County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	6,613	0	0.0%
Spanish	223	0	0.0%
European (excl Spanish)	21	0	0.0%
Russian / Slavic	8	0	0.0%
Asian (all)	49	0	0.0%
Arabic (all)	0	0	0.0%
All other	0	0	0.0%

### English proficiency of Vermilion County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	28,844	0	0.0%
Spanish	871	119	0.4%
European (excl Spanish)	254	67	0.2%
Russian / Slavic	5	0	0.0%
Asian (all)	168	67	0.2%
Arabic (all)	19	19	0.1%
All other	24	0	0.0%

### English proficiency of Wabash County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	4,622	0	0.0%
Spanish	142	7	0.1%
European (excl Spanish)	11	3	0.1%
Russian / Slavic	0	0	0.0%
Asian (all)	8	0	0.0%
Arabic (all)	0	0	0.0%
All other	1	1	0.0%

### English proficiency of Warren County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	6,073	0	0.0%
Spanish	390	111	1.7%
European (excl Spanish)	173	42	0.6%
Russian / Slavic	4	0	0.0%
Asian (all)	82	50	0.7%
Arabic (all)	0	0	0.0%
All other	0	0	0.0%

### English proficiency of Washington County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	5,534	0	0.0%
Spanish	80	0	0.0%
European (excl Spanish)	57	8	0.1%
Russian / Slavic	34	7	0.1%
Asian (all)	12	10	0.2%
Arabic (all)	0	0	0.0%
All other	5	0	0.0%

### English proficiency of Wayne County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	6,595	0	0.0%
Spanish	99	24	0.4%
European (excl Spanish)	133	12	0.2%
Russian / Slavic	2	0	0.0%
Asian (all)	24	0	0.0%
Arabic (all)	0	0	0.0%
All other	0	0	0.0%

### English proficiency of White County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	5,592	0	0.0%
Spanish	44	5	0.1%
European (excl Spanish)	18	0	0.0%
Russian / Slavic	0	0	0.0%
Asian (all)	12	0	0.0%
Arabic (all)	0	0	0.0%
All other	3	0	0.0%

### English proficiency of Whiteside County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	21,124	0	0.0%
Spanish	1,600	135	0.6%
European (excl Spanish)	250	5	0.0%
Russian / Slavic	117	6	0.0%
Asian (all)	69	30	0.1%
Arabic (all)	18	0	0.0%
All other	37	6	0.0%

### English proficiency of Will County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	186,527	0	0.0%
Spanish	29,888	4,512	1.9%
European (excl Spanish)	8,716	833	0.3%
Russian / Slavic	5,571	890	0.4%
Asian (all)	7,413	852	0.4%
Arabic (all)	1,365	126	0.1%
All other	1,830	94	0.0%

### English proficiency of Williamson County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	27,397	0	0.0%
Spanish	577	29	0.1%
European (excl Spanish)	242	0	0.0%
Russian / Slavic	25	0	0.0%
Asian (all)	451	47	0.2%
Arabic (all)	29	0	0.0%
All other	53	0	0.0%

### English proficiency of Winnebago County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	98,258	0	0.0%
Spanish	10,856	1,723	1.5%
European (excl Spanish)	1,927	122	0.1%
Russian / Slavic	1,251	240	0.2%
Asian (all)	1,915	287	0.2%
Arabic (all)	424	54	0.0%
All other	818	206	0.2%

### English proficiency of Woodford County households

Dual-Language Households	Number of Households	Households Speaking English "Less Than Very Well"	Limited English Proficiency (% of total)
English Only	14,355	0	0.0%
Spanish	175	12	0.1%
European (excl Spanish)	94	0	0.0%
Russian / Slavic	11	0	0.0%
Asian (all)	66	35	0.2%
Arabic (all)	0	0	0.0%
All other	3	0	0.0%