



Illinois Liquor Control Commission

LANGUAGE ACCESS PLAN FOR INTERACTION WITH PERSONS WITH LIMITED ENGLISH PROFICIENCY

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SECTION 1: INTRODUCTION AND BACKGROUND

1.1 ILLINOIS LIQUOR CONTROL COMMISSION OVERVIEW

INTRODUCTION

The State of Illinois is home to one of the largest immigrant populations in the United States, with nearly 1.9 million immigrants contributing to the state’s vibrant cultural and economic landscape. Among them, nearly 1 million residents speak languages other than English at home and report speaking English less than “very well.” As this linguistically diverse population continues to grow, Illinois recognizes that all residents—regardless of English proficiency—have a right to equitable access to government services.

This Language Access Plan outlines the Illinois Liquor Control Commission’s (ILCC) five-year plan for language access implementation, a timeline selected to achieve greater alignment with the Illinois Language Equity and Access Act, 15 ILCS 56/1 *et seq.* Section 1 of the Language Access Plan sets the stage for the plan by providing an overview of the Illinois Liquor Control Commission and establishing the purpose, goals, and guiding principles that anchor the Language Access Plan. The sections that follow, Sections 2 to 7, address specific areas of language access implementation. Each area of implementation is addressed in two distinct parts, which include:

1. **Overview of Standard** (or Implementation Area): A brief description of the standard based on federal guidance and the Language Equity and Access Act.
2. **Current ILCC Systems and Practices:** A description of ILCC’s current practices, existing infrastructure, and/or progress to date in relation to the standard
Implementation Goals and a 5-Year Action Plan is provided to support agency implementation:
Implementation Goals: provides an overview of the overarching goals the ILCC will pursue to meet compliance objectives

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

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

ILLINOIS LIQUOR CONTROL COMMISSION'S ROLE

ILCC's mission is "to protect the health, safety and welfare of the people of Illinois through careful control and regulation of the manufacture, distribution, and sale of alcoholic liquors and through the development of strategies to reduce youth access to alcohol products." The ILCC is responsible for regulating the manufacture, distribution, and retail sale of alcoholic beverages in Illinois, as authorized by the Illinois Liquor Control Act [235 ILCS 5] ("Act"). Under the Act, the ILCC has the power to issue, suspend, and revoke state liquor licenses and Beverage Alcohol Sellers and Servers Education and Training (BASSET) licenses; inspect and investigate any Illinois establishment where alcoholic liquors are manufactured, distributed, warehoused, or sold; and impose fines for violations of the Act. The ILCC is also responsible for developing industry education programs related to BASSET as well as administering a public awareness program to reduce or eliminate underage purchasing and consumption of alcoholic beverages by persons under the age of 21. The ILCC is also tasked with the adoption of rules and regulations necessary for the ILCC to carry out its functions and duties so that the health, safety, and welfare of the People of the State of Illinois is protected, while promoting and fostering temperance in the consumption of alcoholic liquors.

The ILCC's website is: <https://ilcc.illinois.gov/>

The ILCC's Language Access Coordinator is: Patrick Schoeben, Human Resources Director.

ILCC's Divisions, Offices, and Programs: Licensing, Enforcement, Industry Education, Legal, Fiscal, Administration Services, Human Resources, Internal Affairs, Information Technology, and Legislative Affairs.

The Illinois Liquor Control Commission (ILCC) has established and is actively advancing a comprehensive language access program grounded in a formal Language Access Plan (LAP) framework and a Tier II designation, informed by a needs assessment identifying Spanish as

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the most frequently encountered language in Cook County, followed by Polish and Chinese, and supplemented by ongoing encounter reporting. ILCC currently provides Spanish interpretation through bilingual staff and leverages Propio telephonic/video interpretation for other languages, translates vital documents upon request, and ensures public awareness through "I Speak" posters, website messaging, and verbal notice. The agency supports implementation through HR-coordinated onboarding and annual training, maintains an HR-led complaint intake and review process with escalation to the Office of New Americans (ONA) as appropriate, and conducts annual monitoring of limited English proficient (LEP) encounters, trends, training effectiveness, and interpretation/translation utilization. Building on this foundation, ILCC's implementation goals are to institutionalize governance and repeatable procedures across all public-facing functions and to develop auditable, consistent language access operations spanning interpretation, translation, notice, training, monitoring, and concern resolution. Over a five-year period, ILCC will progress through phased implementation: Phase 0 will formalize ownership, SOPs, and minimal documentation controls aligned to current LAP elements; Phase I will operationalize standardized workflows and staff tools for interpreter use, translation requests, complaint intake, and encounter reporting; Phase II will expand coverage across all interaction channels while maturing quality assurance and reporting for interpretation, translation, and training; and Phase III will focus on program evaluation, KPI-driven (key performance indicator) continuous improvement, and a refreshed LAP informed by monitoring outcomes.

1.2 LANGUAGE ACCESS PLAN LEGAL BASIS AND PURPOSE

PURPOSE AND GOALS

This Language Access Plan aims to provide guidance to ILCC staff and establish a roadmap to support meaningful access to the department's services, programs, and opportunities for individuals with LEP. The Language Access Plan also seeks to align the department's efforts and bring the ILCC into compliance with Illinois' Language Equity and Access Act 15 ILCS 56/1 *et seq.*, the Illinois Civil Rights Act of 2003, Title VI of the Civil Rights Act of 1964 and other applicable federal and state standards and guidelines.

AUTHORITY

As a recipient of federal financial assistance, Illinois is bound by Title VI of the Civil Rights Act of 1964 (Title VI), 42 U.S.C. §§ 2000d-2000d-7, and its implementing regulations, 45 C.F.R. Part 80, which prohibits discrimination based on race, color, or national origin (which includes Limited English Proficiency). Illinois is committed to advancing the goals of Title VI of the Civil Rights Act of 1964 in alignment with the State of Illinois' Language Equity and Access Act (Public Act 103-0723)

Title VI of the Civil Rights Act of 1964

[Title VI of the Civil Rights Act of 1964](#) (42 U.S.C. § 2000d) (Title VI) prohibits discrimination on the basis of race, color, or national origin in any program or activity receiving federal financial assistance. As a recipient of federal financial assistance, the ILCC is bound by Title VI of the Civil Rights Act of 1964 (Title VI), 42 U.S.C. §§ 2000d-2000d-7, and its implementing regulation, 45 C.F.R. Part 80, which prohibits discrimination based on race, color, or national origin (which includes Limited English Proficiency).

Illinois Civil Rights Act of 2003

The [Illinois Civil Rights Act](#) prohibits State, county, or local government in Illinois from excluding a person from participation in, denying a person the benefits of, or subjecting a person to discrimination under any program or activity on the grounds of that person's race, color, national origin, or gender. Additionally, the Illinois Civil Rights Act prohibits using criteria or methods that have a discriminatory effect.

Illinois Human Rights Act (IHRA)

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

Language Equity and Access Act

Signed into law by Governor Pritzker in 2024, the Language Equity and Access Act (15 ILCS 56/1 *et seq*) 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

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

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participating in civic life.² The Act aims to ensure all Illinois residents, including individuals with LEP, have meaningful and equitable access to state services, programs, information, and activities by removing language barriers. The act incorporates federal guidance for ensuring meaningful access for individuals with LEP and other federal and state legislation that prohibit discrimination based on national origin and promote language access, including Title VI of the Civil Rights Act of 1964, the Illinois Human Rights Act of 1979, and the Illinois Civil Rights Act of 2003.³

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

Under the Act, the ONA will lead the development of a Language Needs Assessment Report using U.S. Census data to identify the languages spoken across Illinois and inform agency planning. All state agencies will develop Language Access Plans that will inform how the agency will ensure meaningful access to individuals with LEP, appoint a Language Access Coordinator (LAC) to oversee implementation within each agency, and translate vital documents and provide qualified interpretation services for LEP populations.

GUIDING PRINCIPLES

In accordance with federal and state requirements, including the Illinois Language Equity and Access Act (15 ILCS 56/1 *et seq.*), this Language Access Plan provides a framework for ensuring the ILCC can deliver timely and meaningful language assistance services to ILCC's constituents with LEP. The ILCC is committed to providing equitable language access to its services, programs, and activities for all individuals, regardless of the language they use. The ILCC will operationalize this commitment to language access by:

- Designating a Language Access Coordinator who is responsible for overseeing the development and implementation of the Language Access Plan.
- Serving all individuals with LEP and providing accurate, timely, and effective communication, including oral and written language services needed to assist persons with LEP to communicate effectively, and providing them with equal opportunity to participate fully in the services, activities, or other programs administered by the state. This includes displaying public notices in commonly

² See *Language Equity and Access Act*, 15 ILCS 56/1 *et seq.*, 103rd Gen. Assem. (Ill. 2024), <https://www.ilga.gov/Legislation/ILCS/Articles?ActID=4526&ChapterID=4>

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

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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 ILCC's capacity to develop and distribute multilingual content and expanding access to translated vital documents and other resources. Translation of vital records will be prioritized with guidance provided by ONA. The 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. ILCC will maintain a complaint and review process and ensure timely resolution.
- Providing ongoing employee development and training to maintain well-trained bilingual employees and general staff. ILCC will also collect and report data on bilingual staff roles, language certifications, and language capacity across its workforce.
- Ensuring the Language Access Plan and related materials are publicly available through ILCC's website and other accessible formats.

DEFINITIONS

- **State Agency:** any State of Illinois agency, board, or commission, directly responsible to the Governor, that provides direct or indirect services, resources, programs, information, data, policies, instructions, or activities to the public, Funded Entities, and staff.
- **Tier I State Agency:** State Agencies that have primary responsibilities that involve providing direct or indirect services and information to the public and have a relatively large staff, budget, and operational scope.
- **Tier II State Agency:** State Agencies that have responsibilities that involve providing direct or indirect services and information to the public and/or have a relatively medium-to-small staff, budget, and/or operational scope.

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- **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.

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- **Language Access Liaison (LAL):** staff of a division, program, or Funded Entity tasked with coordinating and overseeing the entity's language access implementation activities, working under an LAC
- **Language Assistance Services:** oral and written language services needed to assist individuals with LEP to communicate effectively with staff, and to provide individuals with LEP meaningful access to, and equal opportunity to participate fully in, the services, activities, or other programs administered by the State.
- **Compliance Evaluation Framework:** an evaluation methodology involving the Language Assessment Rubric and Reporting Tool which the Statewide Manager for Language Access will use to monitor the compliance of State Agencies.
- **Interpretation:** the act of listening to a communication in one language (source language) and orally converting it to another language (target language) while retaining the same meaning. See also Oral Language Services.
- **Oral Language Services:** includes various methods to provide verbal information and interpretation, such as staff interpreters, Multilingual Staff, telephone interpreter programs, tele-video interpretation services, and private interpreter programs. See also Interpretation.
- **Multilingual Staff:** staff member who has demonstrated proficiency in one or more language other than English and is formally assigned and fairly compensated to either provide language assistance services such as interpretation and/or translation to individuals with LEP, or serve in a policy, resource, or advisory role to provide their cultural and linguistic expertise.
- **Language Service Provider (LSP):** a vetted contractor/vendor contracted to perform language assistance services, such as interpretation and/or translation, for individuals with LEP.
- **Four-Factor Analysis:** a framework intended to aid recipients of federal financial assistance with conducting an individualized assessment of their programs and activities to help them prioritize language access services.
- **Translation:** the conversion of written text from one language (source language) into an equivalent written text in another language (target language) to convey the intent and essential meaning of the source text.
- **Plain Language:** a style of communication that aims to make written or spoken information easy to understand for a broad audience. The Plain Language Act (2010) defines Plain Language as “clear, concise, well organized, and follows other best practices appropriate to the subject or field and intended audience.”⁴ Language intended for public consumption avoids non-essential information and complex phrasing; highlights essential information; avoids the use of technical terms and industry jargon; and simplifies complex information.

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

- **Vital Documents:** public-facing written materials, whether in paper or electronic format and made available on any platform (including websites), that are created, issued, or distributed by a State Agency to communicate with the public. These documents contain information that affects an individual's access to, retention of, termination of, or exclusion from program services or benefits; are required by law; or serve to: Inform the public about rights, responsibilities, rules, services, resources, or events; allow individuals to apply for or participate in programs or benefits; notify individuals about their eligibility, participation, or benefits; and provide instruction, guidance, or complaint submission processes.

SECTION 2: NEEDS ASSESSMENT

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

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

Factor 1: Data collection and analysis of the population with limited English proficiency.

Factor 2: Data collection and analysis of languages encountered.

Factor 3: Services Provided to General Public and/or Prospective Limited English Proficient Users.

Factor 4: Budget and Available Resources.

Data provided in this section illustrates the number of individuals with limited English proficiency and with LEP who may need language services, as well as the types of services the ILCC provides that the general public and potential individuals with LEP would access.

⁵ See Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (67 FR 41455) (2002).
<https://www.federalregister.gov/documents/2002/06/18/02-15207/guidance-to-federal-financial-assistance-recipients-regarding-title-vi-prohibition-against-national>

2.1 FOUR-FACTOR ANALYSIS

FACTOR 1

Overview of Standards

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

The Illinois Language Equity and Access Act requires each State agency to conduct an individualized assessment to determine the adequacy of its Language Access Plan. This assessment must consider the frequency with which persons with LEP come in contact with services, programs, or activities provided by the agency. In addition, the Act directs ONA, with the support of the Department of Human Services, and any other relevant agencies, to prepare a Language Needs Assessment Report based on available U.S. Census data. This report must identify languages spoken throughout the State and examine the geographic patterns and trend data to inform the development of agency Language Access Plans.

The Language Access Plan must include a description of the LEP populations served, the policy and programmatic actions taken to ensure meaningful access, and the metrics used to measure compliance with the Act. Agencies must regularly monitor demographic population changes to ensure language services adequately reflect actual needs, particularly for services frequently utilized by the public.

This analysis helps ensure that the ILCC is positioned to adequately identify underserved communities with LEP and emerging language needs and address any barriers that may prevent access to critical public services.

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

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

⁶ See Rob Paral, "Language Needs Assessment Report," Office of New Americans, Office of the Governor of Illinois, Great Cities Institute at the University of Illinois Chicago (2025), <https://arcq.is/1Py4n0>.

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- Eleven languages have more than 10,000 limited-English speakers in Illinois, including:

Largest Language Groups and Largest Limited-English Language Groups in Illinois: 2018-2022			
Largest Language Groups		Largest Limited-English Language Groups	
	# of Speakers		# of Speakers
Spanish	1,638,222	Spanish	616,760
Polish	169,308	Polish	73,843
Chinese*	106,399	Chinese*	51,494
Filipino, Tagalog	86,051	Filipino, Tagalog	23,198
Arabic	67,017	Arabic	20,342
Urdu	56,122	Korean	20,165
Gujarati	50,196	Gujarati	18,762
Hindi	47,274	Russian	17,649
Russian	44,211	Vietnamese	13,966
Korean	39,624	Urdu	13,893
French	36,728	Ukrainian, Ruthenian, Little Russian	11,817

- The predominant language other than English in many Illinois counties may be Spanish, but closer examination of the most common non-English languages shows that immigrants and migrants come to Illinois from many places. For example, in Champaign County, the top language spoken in limited English households is Mandarin, and in Macon County, it is Tagalog. Additionally, in Cass and Knox counties, the second language is French/Haitian/Cajun. In Madison County, it's Tagalog. In Cook, DuPage, and Kane counties, the second language category is Slavic. In Boone County, "other Asian Pacific Islander" is second to Spanish.
- A statewide map of persons who don't speak English very well shows that the largest numbers of such persons are in the metro Chicago area. Nevertheless, significant numbers of up to 9 thousand are located in townships across the state and are often located near metro areas such as St. Louis, Springfield, Champaign, and Rock Island. There are also notable populations in relatively rural townships in counties such as Cass, Douglas, or Union.
- After years of decline, the number of Illinois residents who don't speak English very well is on the rise. In examining ten years, from 2014 to 2023, this population fell by 79,000 persons between 2014 and 2019. But since a low of 1.0

million in 2019, the most recent data, for the year 2023, shows about 1,082,000 persons, for a gain of some 82,000.

FACTOR 2

Overview of Standard

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

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

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

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

Current ILCC Systems and Practices

ILCC supplements statewide demographic data with operational encounter reporting and conducts annual monitoring that includes LEP encounter counts and language trends.

- **Implementation Goals**
 - Implement a consistent, auditable LEP encounter data collection method supporting annual monitoring and prioritization.
 - Ensure encounter reporting produces reliable counts/trends by language, service type, and channel.
- **5-Year Action Plan**
 - Phase 0 (Year 0): Define a single encounter log standard (fields, owner, cadence, storage) aligned to “operational encounter reporting.”

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- Phase I (Year 1): Train staff on capture requirements; add monthly QA sampling; begin quarterly rollups that feed annual monitoring.
- Phase II (Years 2–3): Integrate encounter tracking into core intake workflows (phone/in-person/online); add channel and outcome analytics.
- Phase III (Years 4–5): Use multi-year trend data to recalibrate language priorities and resource allocation annually.

FACTOR 3

Overview of Standard

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

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

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

Current ILCC Systems and Practices

ILCC notifies the public via Chicago and Springfield office “I Speak” posters, website notices, and verbal notification during interactions.

- **Implementation Goals**
 - Document all public interaction channels and define prioritized services where language access must be consistently available.
 - Align interpretation/translation readiness to those prioritized services first.
- **5-Year Action Plan**
 - Phase 0 (Year 0): Inventory interaction channels and service lines; define “prioritized services” criteria (volume, time-sensitivity, impact).
 - Phase I (Year 1): Map each prioritized service to required language access supports (Propio/bilingual staff, translated vital docs, notice points).

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- Phase II (Years 2–3): Standardize language access procedures by channel (front desk, phone intake, email responses, web content).
- Phase III (Years 4–5): Use annual monitoring data to adjust prioritized services and language coverage.

FACTOR 4

Overview of Standard

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

The Illinois Language Equity and Access Act requires State Agencies to review the resources available to the State Agency and the costs. It is best practice for the budget for language access services to be based on programmatic needs and the top five languages prioritized for services. Additionally, a strategic practice is to outline the costs associated with current language assistance services, as well as assess the level of resources, costs, and capacity to implement and support additional language services over time. Based on the assessment of resources, the ILCC will identify efforts to support cost-savings and cost-sharing when/if needed. Such efforts may include sharing resources with other departments and agencies and/or using technology to support the delivery of language assistance services.

Current ILCC Systems and Practices

ILCC conducts annual monitoring of interpretation/translation usage.

- **Implementation Goals**
 - Establish a cost monitoring model tied to interpretation/translation usage and budgeting.
- **5-Year Action Plan**
 - Phase 0 (Year 0): Define cost categories and owners (Propio, translation, internal labor estimates).
 - Phase I (Year 1): Implement quarterly cost-and-usage reporting; reconcile with annual monitoring.
 - Phase II (Years 2–3): Add service/channel-level allocation for high-volume areas; identify cost drivers and efficiency opportunities.
 - Phase III (Years 4–5): Set multi-year cost benchmarks and incorporate into annual planning and LAP refresh.

SECTION 3: STAFFING AND COORDINATION

Overview of Standards

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

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

The Illinois Language Equity and Access Act directs State agencies to incorporate language equity compliance provisions into their contracts with vendors, grantees, and purchase of care entities, ensuring that these funded entities provide language assistance services to individuals with LEP.

ILCC conducts programs and services in partnership with a wide network of grantees and funded entities. Therefore, the ILCC will take affirmative steps to ensure those entities fulfill language access obligations to support monitoring and accountability.

SECTION 4: LANGUAGE ASSISTANCE SERVICES

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

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

4.1 LANGUAGE ASSISTANCE SERVICES PLAN

LANGUAGE ACCESS SERVICES

1. LANGUAGE NEED IDENTIFICATION

- **Overview of Standard**

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

- **Current ILCC Systems and Practices**

The ILCC uses "I Speak" posters in Chicago and Springfield offices, plus website notices and verbal notification during interactions.

- **Implementation goals**

- Ensure consistent, fast identification of language need across in-person and virtual interactions.

- **5-Year Action Plan**

- Phase 0 (Year 0): Standardize "I Speak" poster placement and adopt language identification scripts for staff.
- Phase I (Year 1): Add language ID cards at points of service; create a web/phone prompt for language selection.
- Phase II (Years 2–3): Integrate identification into intake workflows and training refreshers.

- Phase III (Years 4–5): Use encounter trend data to update materials (top languages displayed, placement changes).

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

- **Overview of Standard**

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

- **Current ILCC Systems and Practices**

ILCC provides Spanish bilingual staff interpretation and Propio telephonic/video interpreters for other languages.

- **Implementation Goals**

- Ensure interpreter access is timely, appropriate to complexity, and quality-managed across all interactions.

- **5-Year Action Plan**

- Phase 0 (Year 0): Publish decision rules (bilingual staff vs Propio), confidentiality expectations, and a quick-start guide.
- Phase I (Year 1): Implement interpreter issue reporting/escalation; incorporate into annual training.
- Phase II (Years 2–3): Add QA sampling (staff feedback, issue trend review) tied to annual monitoring.
- Phase III (Years 4–5): Establish KPIs (connection time, issue rates) and revise procedures based on multi-year trends.

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

- **Overview of Standard**

Illinois Liquor Control Commission's Language Access Plan

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

- **Current ILCC Systems and Practices**

Same as above: Spanish bilingual staff interpretation and Propio telephonic/video for other languages.

- **Implementation Goals**

- Same as above: timely, appropriate, quality-managed interpretation across services.

- **5-Year Action Plan**

- Same as above (Phases 0–III).

4. EMPLOYING/ UTILIZING BILINGUAL OR MULTILINGUAL STAFF

- **Overview of Standard**

The Illinois Language Equity and Access Act require the Governor's Office of New Americans, with the support of the Department of Human Services, and any other relevant agencies to set standards for adequate staffing of bilingual employees at State Agencies, including a methodology for monitoring implementation and updating the State Services Assurance Act and the Bilingual Employment Plan, based on the Language needs Assessment. While the Language Equity and Access Act specifically uses the term "bilingual staff", national language access best practices recognize and value the role of multilingual staff, highlighting the broad linguistic competencies of individuals who possess proficiency in more than two languages or multiple linguistic repertoires.

- **Current ILCC Systems and Practices**

Vital documents are translated upon request.

- **Implementation Goals**

- Establish a controlled, timely translation workflow for vital documents and other prioritized materials.

- **5-Year Action Plan**

- Phase 0 (Year 0): Define translation request intake and approval owner(s); establish basic version control.
- Phase I (Year 1): Implement a documented translation workflow (request → prioritize → translate → review → publish → archive).
- Phase II (Years 2–3): Expand workflow to online content and public outreach materials; add periodic refresh cycle.
- Phase III (Years 4–5): Implement KPIs (turnaround time, rework rate) and incorporate into annual monitoring.

5. TRANSLATION OF VITAL DOCUMENTS AND ONLINE CONTENT

- **Overview of Standard**

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

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

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

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

- **Current ILCC Systems and Practices**

Vital documents are translated upon request.

- **Implementation Goals**

- Define “vital documents” operationally, publish the inventory, and implement prioritized translations aligned to encounter trends and service criticality.

- **5-Year Action Plan**

- Phase 0 (Year 0): Publish an appendix as an operational table (document name, owner, update frequency, translation status by language).
- Phase I (Year 1): Prioritize translation into Spanish first; define criteria for adding Polish/Chinese based on encounter data and service risk.
- Phase II (Years 2–3): Extend vital-document approach to web/online content and outreach materials; establish timeliness standards and periodic refresh cycles.
- Phase III (Years 4–5): Annual reassessment of “vital” inventory and language set using monitoring outputs; formalize audit readiness (accuracy/completeness checks).

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

- **Overview of Standard**

The Illinois Language Equity and Access Act requires State Agencies to take steps to ensure that digital content is accessible to individuals with LEP. All translations of public-facing digital content will be completed in a manner that ensures accuracy, completeness, and timeliness, consistent with the Act's requirement for competent translation services. The selection of languages for translation will be guided by current demographic data, the State's Language Needs Assessment, and thresholds outlined in the Language Equity and Access Act.

- **Current ILCC Systems and Practices**

The ILCC does not have a broader multilingual content production practice. Gap: No formats/governance described (e.g., FAQs, web pages, PDFs, templates, signage standards beyond “I Speak”).

- **Implementation Goals**

- Establish a multilingual content strategy aligned to prioritized services and vital documents, with defined formats and owners.

- **5-Year Action Plan**

- Phase 0 (Year 0): Create a multilingual content inventory and assign owners (print + web).

- Phase I (Year 1): Develop standardized formats (signage, key handouts, web notice pages, templates) and translation workflow integration.
- Phase II (Years 2–3): Expand content aligned to encounter trends; implement update triggers tied to policy/form changes.
- Phase III (Years 4–5): Mature governance (version control, accessibility checks, periodic reviews) and evaluate effectiveness via monitoring.

SECTION 5: NOTIFICATION OF LANGUAGE ASSISTANCE SERVICES

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

5.1 NOTIFICATION OF LANGUAGE ASSISTANCE SERVICES PLAN

Overview of Standards

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

Current ILCC Systems and Practices

ILCC notifies the public of free language assistance through “I Speak” posters in Chicago and Springfield offices, website notices, and verbal notification during interactions.

- **Implementation Goals**
 - Ensure notice is consistent, visible, and present across primary service channels and points of contact.

- **5-Year Action Plan**
 - Phase 0 (Year 0): Confirm notice placement and standard language across offices and the website; ensure staff can deliver verbal notice consistently.
 - Phase I (Year 1): Add notice language to high-traffic public communications (e.g., key email mailboxes/signatures and intake scripts).
 - Phase II (Years 2–3): Expand notice to all service entry points (forms, online processes) and validate via periodic checks.
 - Phase III (Years 4–5): Evaluate notice effectiveness using complaint data and encounter trends; refine accordingly.

SECTION 6: LANGUAGE ACCESS TRAINING

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

6.1 LANGUAGE ACCESS TRAINING PLAN

Overview of Standards

The Illinois Language Equity and Access Act requires that State Agencies develop and implement an ongoing employee development and training strategy to maintain well-trained bilingual employees and general staff. This ensures the ILCC is equipped to deliver effective language assistance services.

Current ILCC Systems and Practices

ILCC provides structured informal training during onboarding and annually for staff who interact with the public, coordinated by Human Resources.

- **Implementation Goals**

Illinois Liquor Control Commission's Language Access Plan

- Convert “structured informal” training into a defined curriculum with completion tracking and periodic refreshers.
- **5-Year Action Plan**
 - Phase 0 (Year 0): Define training modules aligned to existing services (notice, interpreter use, translation request process, concern resolution).
 - Phase I (Year 1): Implement completion tracking and annual refresher requirements for public-facing staff.
 - Phase II (Years 2–3): Add scenario-based training for common interactions; incorporate feedback from monitoring.
 - Phase III (Years 4–5): Establish training effectiveness metrics and revise training annually based on outcomes.

SECTION 7: CONCERN RESOLUTION PROCESS

The Concern Resolution Process Section of the Language Access Plan highlights the need for allowing public feedback on the quality, accessibility and effectiveness of language assistance services to address any concerns that arise. This section outlines how the ILCC will develop and make publicly available a multilingual concern resolution form, collect and log complaints submitted by individuals with LEP and others, and promptly investigate and address each concern in a timely manner. Additionally, this section describes how the ILCC will track the resolution status of complaints to ensure transparency and accountability and coordinate with the ONA when appropriate to support compliance and continuous improvement.

Overview of Standards

The Illinois Language Equity and Access Act requires State Agencies to establish and make publicly available a process for individuals with limited English proficiency (LEP) and members of the public to submit concerns related to access to language assistance services. The Illinois Language Equity and Access Act, 15 ILCS 56/15(b)(5) requires, requires each State agency to develop an internal complaint and review process specific to the provision of language assistance services. Complaints that are not resolved in a timely or satisfactory manner may be referred to the Governor's Office of New Americans for further review, per 15 ILCS 56/30(c) of the Act.

Current ILCC Systems and Practices

Language access complaints are reviewed by Human Resources and escalated to the Office of New Americans when internal resolution is not possible.

- **Implementation Goals**
 - Establish a standardized, timely, well-documented concern intake and resolution process aligned to HR's role and ONA escalation.

- **5-Year Action Plan**
 - Phase 0 (Year 0): Define complaint intake methods and minimum documentation requirements; publish HR-owned process.
 - Phase I (Year 1): Implement a complaint log and basic timelines (acknowledgement, investigation, closure); incorporate into annual training.
 - Phase II (Years 2–3): Trend complaint themes and incorporate corrective actions into annual monitoring outputs.
 - Phase III (Years 4–5): Use multi-year complaint trends to refine notice, training, and interpreter/translation processes; formalize continuous improvement reporting.

SECTION 8: MONITORING, EVALUATION, AND REPORTING

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

8.1 MONITORING, EVALUATION, AND REPORTING PLAN

Overview of Standard

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

The ILCC will conduct an individualized assessment of language assistance needs and patterns of language use on an ongoing basis and incorporate updated data and performance metrics into each new iteration of the Language Access Plan, as required under 15 ILCS 56/25(d)(3) requires. The agency will use this information to evaluate the effectiveness of current policies and practices and to inform continuous improvement of language access services.

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

Current ILCC Systems and Practices

ILCC's current infrastructure includes coordination with the Office of New Americans (ONA) as the State's lead entity for agency compliance support, including technical assistance and oversight responsibilities. The ILCC currently uses annual monitoring as including LEP encounter counts, language trends, training effectiveness, and interpretation/translation usage. The ILCC also supplements statewide demographic data with operational encounter reporting.

- **Implementation Goals**
 - Establish a standardized monitoring and evaluation framework with defined data sources, ownership, and cadence that supports compliance reporting and continuous improvement.
 - Produce reliable, auditable performance metrics for language access (encounters, channels, languages, timeliness, quality indicators, training completion/effectiveness, concern resolution trends).

Illinois Liquor Control Commission's Language Access Plan

- Implement ongoing cost monitoring tied to interpretation/translation usage to support budget forecasting and resource allocation.
- **5-Year Action Plan**
 - Phase 0 (Year 0): Define the monitoring framework (owners, cadence, and “system of record”); standardize encounter and service tracking fields; establish baseline KPIs aligned to annual monitoring (encounters/languages/channels, interpretation/translation usage, training completion, concern resolution activity); define cost categories and cost-tracking owners (e.g., Propio, translation, internal labor estimates).
 - Phase I (Year 1): Implement agency-wide monitoring procedures and staff instructions; begin recurring rollups (e.g., quarterly) that feed the annual monitoring summary; implement a basic QA process (spot checks for completeness/accuracy of encounter and service data); initiate quarterly cost-and-usage reporting and reconcile findings to annual monitoring outputs.
 - Phase II (Years 2 and 3): Mature monitoring and evaluation by expanding coverage across all interaction channels and high-priority service lines; implement trend and root-cause analysis (e.g., recurring language needs, interpreter quality issues, translation turnaround concerns); add service/channel-level cost allocation to identify cost drivers and efficiency opportunities; incorporate monitoring outcomes into targeted procedural updates and training refreshers.
 - Phase III (Years 4 and 5): Conduct program evaluation using multi-year performance and cost trends; recalibrate language priorities and service strategies based on outcomes; establish multi-year cost benchmarks and integrate into annual planning; refresh the LAP using monitoring results and documented corrective actions to demonstrate continuous improvement and audit readiness.

SECTION 9: RESOURCES

- Illinois Statewide Coordination Plan Draft ([Link](#))
- Illinois Language Access Toolkit

SECTION 10: APPENDIX

10.1 APPENDIX 1: FACTOR 1 AMERICAN COMMUNITY SURVEY DEMOGRAPHIC DATA