

Issued: 05/13/2021  
Date Reviewed: 02/8/2026  
Date Revised: 5/21/2026

# ILLINOIS EMERGENCY MANAGEMENT AGENCY & OFFICE OF HOMELAND SECURITY

## Language Access Plan

### I. Introduction

The Illinois Emergency Management Agency & Office of Homeland Security (IEMA-OHS) have prepared this Language Access Plan (LAP), which defines the actions taken and to be taken by IEMA-OHS, given fiscal feasibility, to ensure meaningful access to agency services, programs, and activities on the part of non-English speakers ("NES") and persons who have limited English proficiency (LEP). IEMA-OHS will review and update this LAP in accordance with the schedule described herein in order to ensure continued responsiveness to community needs and compliance with applicable legal requirements.

### II. Purpose

This LAP establishes guidelines and procedures for the provision of services to persons with LEP. It is the policy of IEMA-OHS, as set forth in Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000), to prohibit national origin discrimination as it affects persons with LEP. Furthermore, in accordance with Presidential Executive Order 13 166, "Improving Access to Services for Persons with Limited English Proficiency," as a recipient of Federal financial assistance IEMA-OHS must provide to persons with LEP meaningful access to their respective services.

A person with LEP is someone who is not able to speak, read, write or understand the English language at a level that allows effective interaction with IEMA-OHS, as well as understand, or take full advantage of IEMA-OHS programs and services in English. A person with LEP requires interpretation and/or translation services in order to be provided meaningful access to IEMA-OHS programs and services. Under no circumstances shall services to an individual with LEP be denied or unnecessarily delayed because of the individual 's limited English proficiency. An individual maintains the right to self-identify as a LEP person, as well as the right to indicate their language of preference, particularly as it relates to provision of IEMA-OHS's services.

This LAP provides guidance to IEMA-OHS staff in reducing language access barriers that can stand in the way of Illinois' communities and residents accessing IEMA-OHS services, programs, and activities. The guidelines established herein contain specific procedures which must be followed to ensure sound and consistent language access. All language access activities undertaken by any division, office, or program within IEMA-OHS shall conform to this LAP. All IEMA-OHS personnel are required to act in accordance with this LAP. Failure to do so may result in disciplinary action up to and including discharge.

This LAP applies to all IEMA-OHS staff who interact with the general public. Interaction includes both in-person and phone communication. Phone communication occurs when members of the public call any IEMA-OHS office, the IEMA-OHS Operations Center, or any other permanent or temporary call center or hotline operated by IEMA-OHS. Adherence to this LAP will ensure individuals with LEP and those that are visually impaired are informed and receive interpretation services at no cost to them. IEMA-OHS will facilitate access to such services.

### III. Role of IEMA-OHS and its Services

The primary responsibility of IEMA-OHS is to better prepare the State of Illinois for natural, human-caused, or technological disasters, hazards, or acts of terrorism. Our goal is a "better prepared state."

IEMA-OHS's Office of Emergency Management (OEM) coordinates the State's disaster mitigation, preparedness, response and recovery programs and activities, functions as the State Emergency Response Commission, and maintains a 24-hour Operations Center and the State Emergency Operations Center (SEOC). The SEOC acts as lead in crisis/consequence management response and operations to notify, activate, deploy and employ state resources in response to any threat or act of terrorism. IEMA-OHS assists local governments with multi-hazard emergency operations plans and maintains the Illinois Emergency Operations Plan (IEOP).

IEMA-OHS's Office of Nuclear Safety (ONS) is responsible for protecting Illinois residents from the potentially harmful effects of ionizing radiation, administering more than two dozen radiological programs to protect citizens and the environment. Programs include extensive emergency planning and response efforts and training for local responders for accidents involving radiation; inspecting and regulating radioactive materials licensees; registering and inspecting radiation producing equipment and facilities statewide; accrediting medical radiation technologists; and certifying mammography facilities. IEMA-OHS also monitors the nuclear power reactors and nuclear stations licensed to generate electricity in Illinois and inspects and escorts spent nuclear fuel shipments.

IEMA-OHS's Office of Homeland Security's (OHS) primary function is to create a safer and more resilient State by prioritizing education and prevention, and empower all Illinoisians, community, and organization with the knowledge, skills, and resources needed to identify, mitigate, and prevent potential threats. OHS works to ensure the well-being and security of our residents and critical infrastructure and aims to build a State that is not just better prepared but also actively prevents crises, making our homeland truly secure for generations to come.

### Office of Emergency Management

#### **Operations Division**

##### *Field Operations*

IEMA-OHS operates eight regional field offices that are each staffed by a Regional Coordinator and other personnel. These Regional Offices typically work with counties and other units of local

government to assist them with their disaster-related and non-disaster emergency management and preparedness needs. A survey of the eight Regional Offices found that those offices do not regularly encounter constituents in need of language assistance. Instead, the need for language assistance typically arises at the level of the local jurisdictions and is addressed at that level.

If the need for language assistance were to arise at the Regional Office level, the Regional Office in question would work back through the Field Operations Section Manager and/or the Operations Division Chief in non-disaster times, to request assistance through the agency's procurement processes utilizing the State Master Contract that is in place. (See discussion below, at Language Assistance Services and Protocols.) In times of disaster, a request would be placed in WebEOC, IEMA-OHS's software for managing resource requests and other disaster related information and routed to the SEOC Manager. The SEOC Manager then would work to fill the request working with the IEMA-OHS Procurement Liaison assuring the agency has placed an order through the State Master Contract, Illinois National Guard or FEMA (if engaged in responding to the disaster), or through volunteer organizations such as the American Red Cross. If there is not a disaster IEMA-OHS staff would request the services through the Request to Purchase system ("RTP").

In addition, depending on the need for language services in an emergency response, IEMA-OHS and/or the SEOC can reach out to the following state agencies and partners to address these needs per identified roles and responsibilities in the State of Illinois Emergency Operations Plan (IEOP).

- Annex 6 Population Protection: Central Management Services, Assist in identifying translators and interpreters.
- Annex 6 Population Protection: Department of Human Services, Assist in identifying translators and interpreters.
- Annex 6 Population Protection: Illinois Deaf and Hard of Hearing Commission, Assist in providing interpreters for the deaf and hard of hearing.

Two additional contexts in which language services may be required in an emergency response are (1) during the provision of mass care to disaster survivors, and (2) during a Multi-Agency Resource Center (MARC) event. In the event of a mass care response, in particular, advisory notices such as poster boards may provide the first line of language access to disaster survivors in a mass care shelter. See below at Section V.D.4, Advisory Notices for Mass Care Services and Multi-Agency Resource Centers (MARC).

### ***Inter-Agency Strategic Planning Cell (ISPC)***

The Inter-Agency Strategic Planning Cell (ISPC) works with municipal, state, federal, and volunteer organizations on a variety of emergency management planning issues. This Section coordinates with state agency and mutual partners to develop and maintain the IEOP, addressing mitigation, preparedness, response and recovery from natural, human-caused, and technological emergencies. The IEOP is utilized by IEMA-OHS to manage multi-agency state response to large-scale emergencies and provides linkage to the Federal Response Plan for requesting federal

disaster assistance. The ISPC also supports planning for hazard-specific events such as floods, tornados, earthquake, terrorism, and other topics. Finally, the ISPC maintains a large enterprise of planning and procedural products for the IEMA-OHS, as well as for the state's emergency management program. In addition to these products, the ISPC is also charged with serving as the entity in charge of maintaining the emergency management accreditation for the state by the Emergency Management Accreditation Program (EMAP).

Similar to IEMA-OHS Field Operations, the ISPC typically does not encounter a need for language assistance for the constituents with which it works. If such a need were to arise, it would be addressed in generally the same manner as for Field Operations.

### ***Training and Exercises***

The Training and Exercise Section for the Illinois Emergency Management Agency & Office of Homeland Security (IEMA-OHS) provides training and exercise opportunities to local emergency management program personnel as well as other State agency partners, local non-profit organizations, local non-governmental agencies, and state and local first responder organizations defined in the Homeland Security Presidential Directive 8 (PPD-8) (police, fire, emergency management, emergency medical services, public health, public works and others) throughout the State of Illinois.

The IEMA-OHS training registration form has a section for potential students to identify any additional assistance they may need to successfully complete the training course. If any need for assistance is identified by the student, the Training and Exercise Section will work with the State Emergency Operations Center Liaisons to find assistance in delivering the course in a manner that would meet any student needs to successfully complete the course. This assistance may include needs for deaf/hard of hearing, visual impairments, and limited English-speaking aides. There may be other needs identified by the students that would require other assistance. The Training and Exercise Section will work with all State Agency partners and potentially local governments and non-governmental organizations that may have the appropriate resource to successfully conduct the course for all students.

### ***Operations Center***

IEMA-OHS operates a 24/7 communications center known as the Operations Center. The Operations Center handles calls to the State of Illinois' 24-hour response number, (217) 782-7860 [FAX: (217) 782 - 7774], including reports of incidents such as chemical releases into the environment. The Operations Center provides Language Interpretation Directions to all phone operators in the Operations Center, instructing them on how to access interpreter services through the State Master Contract with Propio Language Services, LLC. Entities could be alerted to the availability of the State Master Contract but would be required to follow their own procurement processes for ordering off of the Master Contract. See attachment to this LAP; see also discussion below, at Language Assistance Services and Protocols.

## **Recovery Division**

### ***Regional Planning and Training***

IEMA-OHS operates three regional field offices that are each staffed by a Regional Disaster Service Planner. These Regional Offices typically work with counties and other units of local government to assist them with their disaster-related and non-disaster emergency management and preparedness needs. A survey of the three Regional Offices found that those offices do not regularly encounter constituents in need of language assistance. Instead, the need for language assistance typically arises at the level of the local jurisdictions and is addressed at that level.

If the need for language assistance were to arise at the Regional Office level, the Regional Office in question would work back through the Planning and Training Section Manager and/or the Recovery Division Chief in non-disaster times, to request assistance under the State Master Contract that is in place. (See discussion below, at Language Assistance Services and Protocols.) In times of disaster, a request would be placed in WebEOC, IEMA-OHS's software for managing resource requests and other disaster related information and routed to the SEOC Manager. The SEOC Manager then would work to fill the request through the State Master Contract, Illinois National Guard or FEMA (if engaged in responding to the disaster), or through volunteer organizations such as the American Red Cross.

In addition, depending on the need for language services in an emergency response, IEMA-OHS and/or the SEOC can reach out to the following state agencies and partners to address these needs per identified roles and responsibilities in the State of Illinois Emergency Operations Plan (IEOP).

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Two additional contexts in which language services may be required in an emergency response are (1) during the provision of mass care to disaster survivors, and (2) during a Multi-Agency Resource Center (MARC) event. In the event of a mass care response, in particular, advisory notices such as poster boards may provide the first line of language access to disaster survivors in a mass care shelter. See below at Section V.D.4, Advisory Notices for Mass Care Services and Multi-Agency Resource Centers (MARC).

### ***Mitigation and Infrastructure Section***

The Mitigation and Infrastructure Section currently does not have policy guidelines for foreign policy translation. IEMA-OHS mitigation programs work with SLTT jurisdictions, and those jurisdictions work with local individuals and organizations. The jurisdictions have knowledge of LEP populations within their borders and effectively reach out to NES and LEP populations by distributing non-English brochures and having translators available during townhall meetings.

Recently, Spanish language brochures and public announcements were generated by IEMA-OHS/FEMA/Locals to clear projects for potential funding.

### ***Public Assistance Section***

The Public Assistance (PA) Section currently does not have policy guidelines for foreign language interpretation or translation. Historically, PA has not encountered issues with limited English proficiency. The unknown factor is the potential of some applicants not registering due to language access limitations. Translation services may be needed during telephone calls, applicant briefings and preliminary damage assessments. Many FEMA documents are converted; however, certain aspects of the IEMA-OHS PA website interface, specific forms and Q&A, etc., may need conversion.

### ***Individual Assistance***

Individual Assistance (IA) program currently does not have formal policy guidelines for foreign language interpretation or translation in connection with damage assessments or provision of services, although parallel processes already exist to address anticipated language resource needs that are not being met at the local level. Based on past experience, encounters with LEP persons in connection with the IA program would most likely occur during public outreach to make individuals aware of possible benefits, during a preliminary damage assessment, or after a federal major disaster declaration or emergency declaration where IA has been authorized. It is anticipated that, in the first two circumstances, a gubernatorial disaster proclamation would be in place, and in the third circumstance, by definition, federal disaster-response resources would be available.

Accordingly, to the extent that needed language resources were not already being provided by the affected local jurisdiction, IEMA-OHS anticipates that it would address a need for language resources in connection with the IA program similar to the manner in which Field Operations would address such a need in a disaster context. Specifically, IEMA-OHS would work with the local jurisdiction to identify the nature and extent of any language resource requirements, and a request for language resources would be placed in WebEOC, to be routed to the SEOC Manager. The SEOC Manager then would work to fill the request through the State Master Contract, Illinois National Guard or FEMA (if engaged in responding to the disaster), or through volunteer organizations such as the American Red Cross. In addition, IEMA-OHS and/or the SEOC also can reach out to certain other state agencies and partners, as identified above, to address these needs per identified roles and responsibilities in the IEOP.

## **Office of Nuclear Safety**

### ***Radiological Emergency Preparedness***

IEMA-OHS's Radiological Preparedness section is responsible for maintaining a Radiological Task Force capable of responding to and assessing releases of radioactive material, including unintentional releases (e.g., nuclear power station incidents, transportation incidents) and intentional releases (e.g., radiological dispersal devices, improvised nuclear devices). This section reviews and improves policies, plans, operating instructions, SOPs, SOGs, and checklists. They

provide training, conduct drills, and maintain radiation detection instrumentation, vehicles and equipment in a ready state.

The Radiological Emergency Preparedness (REP) manual contains specific guidance regarding foreign language translation for public information materials distributed by Offsite Response Organizations (OROs) and licensees to individuals in the 10-mile Emergency Planning Zone (EPZ) of each nuclear plant in Illinois. IEMA-OHS procedures follow the guidance in the REP Manual. Additionally, both IEMA-OHS and Constellation Energy Generation, LLC are regularly evaluated by FEMA and the NRC to ensure the guidance is followed. English is the principal language for important information for the public during a radiological incident. However, all information must be provided in other languages if more than 1,000 people or 5 percent of the voting-age population in the EPZ speaks a single language other than English. Constellation Energy Generation, LLC is required to verify that those limits have not been exceeded prior to mailing their annual tri-fold postcards. At this time, there are no counties where Constellation Energy Generation, LLC is required to provide information in a language other than English.

Currently, the only publication that the REP program produces is a Farmer Booklet. This booklet provides emergency information for the agricultural community within a 50-mile radius of the nuclear power stations in Illinois. It contains information concerning how the community will be notified and what procedures they should follow in the unlikely event of a radiological emergency at any of the Illinois nuclear power stations. The booklet can be found on the IEMA-OHS website and is only mailed upon request. The web link is provided to the public on Constellation Energy Generation, LLC's annual tri-fold postcard. The document is only available in English but could be translated and posted if needed.

### ***Radioactive Materials Licensing***

IEMA-OHS is an agreement state with the U.S. Nuclear Regulatory Commission and thus is responsible for the regulation and licensing of radioactive materials in Illinois. IEMA-OHS licenses more than 1400 radioactive material sites (e.g. medical, academic, industrial, manufacturing) and routinely inspects them to ensure the safe and secure use of radioactive materials. Additionally, they investigate over 40 events and allegations per year involving the use of radioactive materials to protect public health and safety.

To date, the program has experienced little to no contact with the LEP population and has not identified LEP individuals amongst the licensees. While the primary radiation safety and administrative contacts for entities licensed by IEMA-OHS have historically not included LEP individuals, the population certainly exists as employees of Agency licensees. To that end, the IEMA-OHS website contains both English and Spanish versions of the Notification to Employees regarding the Standards for Protection Against Radiation.

## **Office of Homeland Security**

### **Preparedness & Grants Administration**

IEMA-OHS's Preparedness and Grant Administration ("PGA") implements mitigation projects by providing state, local, tribal and territorial (SLTTs) as well as eligible non-profits with planning

assistance, technical assistance and grant funding. This includes guiding and monitoring SLTTs through the loss reimbursement process such as preparedness and response (PAR), to ensure that they have completed the programs in their entirety and provides a full accounting of funds received.

### ***Preparedness and Response (PAR) Grant Program***

The Preparedness and Response (PAR) Grant Program is directed to SLTTs as opposed to individuals and/or other organizations. The PAR Program currently does not have policy guidelines for foreign policy translation for any PGA Preparedness or Illinois Homeland Security Advisory Council (IL-HSAC) policies and procedures. The Non-Profit Security Grant Program (NSGP) is directed to non-profit organizations. The NSGP notification language on the IEMA-OHS website would need a conversion component possibly. Because the documents and application are mainly FEMA documents, PGA will work with FEMA to ensure availability of those documents in non-English languages as provided by FEMA in accordance with FEMA's own Language Access Plan.

### **Division of Sitewide Interoperability**

The Division works with all levels of public safety government to assist them with communications interoperability disaster-related and non-disaster needs. A survey of the Division found that those individuals do not regularly encounter constituents in need of language assistance. Instead, the need for language assistance typically arises at the level of the local jurisdictions and is addressed at that level.

If the need for language assistance were to arise, individuals would work back through the Division Chief in non-disaster times, to request assistance under the State Master Contract that is in place. (See discussion below, at Language Assistance Services and Protocols.) In times of disaster, a request would be placed in WebEOC, IEMA-OHS's software for managing resource requests and other disaster related information and routed to the SEOC Manager. The SEOC Manager then would work to fill the request through the State Master Contract, Illinois National Guard or FEMA (if engaged in responding to the disaster), or through volunteer organizations such as the American Red Cross.

In addition, depending on the need for language services in an emergency response, IEMA-OHS and/or the SEOC can reach out to the following state agencies and partners to address these needs per identified roles and responsibilities in the State of Illinois Emergency Operations Plan (IEOP).

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## **School and Campus Safety (includes Safe2Help)**

The School and Safety Campus Division was created to provide a clearing house for the dissemination of school safety resources, programs, and training to Illinois schools and community partners. A survey of the Division found that those individuals do not regularly encounter constituents in need of language assistance. Instead, the need for language assistance typically arises at the level of the local jurisdictions and is addressed at that level.

If the need for language assistance were to arise, individuals would work back through the Division Chief in non-disaster times, to request assistance under the State Master Contract that is in place. (See discussion below, at Language Assistance Services and Protocols.) In times of disaster, a request would be placed in WebEOC, IEMA-OHS's software for managing resource requests and other disaster related information and routed to the SEOC Manager. The SEOC Manager then would work to fill the request through the State Master Contract, Illinois National Guard or FEMA (if engaged in responding to the disaster), or through volunteer organizations such as the American Red Cross.

In addition, depending on the need for language services in an emergency response, IEMA-OHS and/or the SEOC can reach out to the following state agencies and partners to address these needs per identified roles and responsibilities in the State of Illinois Emergency Operations Plan (IEOP).

- Annex 6 Population Protection: Central Management Services, assist in identifying translators and interpreters
- Annex 6 Population Protection: Department of Human Services, assist in identifying translators and interpreters
- Annex 6 Population Protection: Illinois Deaf and Hard of Hearing Commission, assist in providing interpreters for the deaf and hard of hearing.

Communications of the Safe2Help Program is through its website, which is currently being redone and updated to include language and accessibility requirements.

## **Office of Homeland Security (OHS) Cont.**

OHS is also comprised of the Homeland Security Strategic Initiatives Division which does not provide direct communication with the public and therefore does not have an established, separate protocol or procedures for the provision of language assistance. Current direct communications OHS has with the public is through the IEMA-OHS website. OHS is participating in those efforts to ensure accessibility and access requirements are met.

#### IV. Language Access Plan

The IEMA-OHS Language Access Plan shall be fully implemented subject to the limited availability of fiscal resources to implement said language access plan. This LAP represents IEMA-OHS' administrative blueprint and general procedures for providing meaningful access to IEMA-OHS services, programs and activities on the part of LEP individuals. This Language Access Plan outlines the tasks IEMA-OHS has undertaken and will undertake to meet this objective.

##### **A. IEMA-OHS Language Access Coordinator**

The Language Access Coordinator (LAC) is the assigned 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. The primary goal of the LAP is to ensure that individuals with limited English proficiency have equal access to services and programs.

Primary duties of the LAC include developing and implementing language access policies and procedures, working with agency sections to ensure implementation of the LAP, and devising a data collection plan of the communities we serve as well as existing tools and resources. The LAC will monitor the plan's performance, review the plan, and update content on an annual basis.

The LAC will work with the Public Information Office (PIO) team to ensure continuity and planning overlap of IEMA-OHS' LAP in the event that the LAC changes.

The LAC is listed below and may be reached via phone, email, and US mail:

Eileen Figueroa  
Illinois Emergency Management Agency & Office of Homeland Security  
2200 South Dirksen Parkway  
Springfield, Illinois 62703  
Phone: 217-299-3312  
[EMA.LanguageCoordinator@Illinois.gov](mailto:EMA.LanguageCoordinator@Illinois.gov)

##### **B. Language Access Needs Assessment**

###### 1. Identification of Language Makeup of Constituent Population

Illinois is a highly diverse state in which numerous LEP households reside. According to U.S. Census Bureau data from the American Community Survey (ACS) for 2023,<sup>1</sup> 22.5% of all

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<sup>1</sup> This is the most recent data available at <https://data.census.gov/table/ACSST1Y2023.S1601?q=S1601:+Language+Spoken+at+Home> as of April 30, 2025.

residents over the age of five speak a language other than English, and 8.7% of all residents speak English less than "very well."

Based on information provided by the Governor's Office, the six primary non-English languages among the LEP population in Illinois are Spanish, Arabic, Polish, Chinese, Hindi and Tagalog. A summary of data from the U.S. Census Bureau for these groups and speakers of other languages can be seen below in Table 1 .

Table 1: Illinois LEP Populations by Number and as a Percentage of Total State Population

Population	Number	% of Total
Population 5 years and over	11,888,663	100.00%
Speak only English	9,004,820	75.7%
Speak a language other than English	2,883,843	24.3%
Speak English less than "Very Well"	1,082,040	9.1 %
Spanish or Spanish Creole*	704,908	5.86%
Italian*	11,450	0.10%
Russian*	19,575	0.16%
Polish*	91,438	0.76%
Hindi*	9,678	0.08%
Gujarati*	17,653	0.15%
Urdu*	11,901	0.10%
Chinese (incl. Cantonese, Mandarin, other)*	50,122	0.42%
Korean*	27,057	0.22%
Vietnamese*	12,489	0.10%
Tagalog*	22,988	0.19%
Arabic*	18,865	0.16%

\*Includes persons who speak this language and who also speak English less than "Very Well." These numbers likely overstate the LEP population because they include persons who self-assess their ability to speak English as "Well."

## 2. Contacts Between IEMA-OHS and its Constituency

While day-to-day direct contacts between the general public and IEMA-OHS are limited, occasional direct contacts between IEMA-OHS and their respective constituencies may occur in a variety of contexts. These contexts include media releases, incoming telephone calls, e-mails, outreach and presentations to potential recipients of IEMA-OHS assistance and IEMA-OHS administered grant programs, and access to the IEMA-OHS and Ready Illinois websites.

Face to face contact with the Citizens of Illinois generally only occurs during preliminary damage assessments conducted by a mix of employees across the agency, though the team is led by the Recovery Division. During these assessments, employees go door to door to get a representative sample of damage in areas that have been preidentified through calls (ex via 211 or 311) or through surveys. Citizens are asked a series of standards questions based on FEMA guidelines. IEMA-OHS does not directly offer any services but rather collects damage assessment data and coordinates with local emergency management agencies and local volunteer groups to assist individuals.

IEMA-OHS primarily interacts with local emergency management agencies, local emergency management services, volunteer groups, and state and federal agencies. We support the coordination of resources and funds during state level emergencies and events during which local counties/municipalities/communities are overwhelmed. We work with other state agencies to coordinate resources as needed, and well as working to bring federal funding and resources through FEMA. During such disasters, local EMAs are primarily responsible for providing translation services to LEP individuals, and IEMA-OHS augments as needed.

**C. Language Resources Assessment and Language Assistance Services and Protocols**

**1. Survey of IEMA-OHS Staff Language Capabilities**

As part of the ongoing development of this LAP, IEMA-OHS conducted a voluntary language fluency survey that was open to all IEMA-OHS personnel. The results of that survey show that, as of May 2025, IEMA-OHS currently has at least six staff members who are fluent in Spanish, as well as staff members who are fluent in American Sign Language, Arabic, Korean, Hindi, Urdu, Punjabi, Hausa, & Nigerian Pidgin. Currently IEMA-OHS, through the rules and regulations set forth by the State of Illinois (SoI) and Central Management Services (CMS), does not have a method through which to certify bilingual employees for the purpose of providing language assistance to LEP individuals. At the present time, IEMA-OHS does not have additional funds that may be used for this purpose, nor does a compensation plan exist for employees who choose to become language certified on their own. The LAC will work with HR to explore options that are in compliance with CMS and SoI to meet the intent of using bilingual employees to assist LEP individuals.

**2. Multi-Ethnic Media Contact List**

The State of Illinois currently maintains a statewide media contact database. This list consists of more than 840 media outlets that provide coverage of Illinois events, which includes 815 media outlets that are based in Illinois. This database can be sorted by print and electronic media. Additionally, the State of Illinois maintains a multi-ethnic media contact list featuring more than 159 stations in Illinois, and that number is included in the 840 total. All media outlets have the ability to help disseminate news releases, media advisories or emergency bulletins to its viewing/listening area.

Because most press releases originating from IEMA-OHS are of a time sensitive matter, IEMA-OHS's Public Information Officer generally distributes the press releases in English and the media outlets translate the press releases on their own for dissemination to their audience in the languages that best serve their communities.

Social media messages are also primarily released in English, however, they are available for translation in different languages upon request. Preparedness and awareness flyers and information are also typically posted in English and Spanish, translation to other languages is also available upon request.

**3. Ready Illinois**

Ready Illinois (<https://Ready.Illinois.gov>) is the state's public facing website that provides one-stop access to a wide range of disaster preparedness information. Ready Illinois offers comprehensive information on steps people can take before emergencies happen, what to do once a disaster has occurred, and tips for recovery after the event. During a disaster, current information about the situation and details about such things as shelters and road closures can be posted on the mobile friendly site to help people access needed information. The site includes disaster flyers for multiple disaster types that are listed in English, Spanish, Arabic, Polish, Simplified Chinese, and Tagalog. In addition to the various family planning and preparedness elements, the site also features public service announcements, many available in Spanish and American Sign Language, press releases and federal, state and local emergency contact information.

#### 4. Advisory Notices for Mass Care Services and Multi-Agency Resource Centers (MARC)s)

While IEMA-OHS does not have regular interactions with members of the general public, one context in which such interactions may occur is at a mass care shelter following a disaster.

The American Red Cross is a volunteer and charitable organization that shelters, feeds and provides emotional support to victims of disasters. As such, the American Red Cross would likely play a leading role in operating shelters and providing mass care services in the aftermath of a significant disaster in Illinois. Language access services provided by the American Red Cross at its mass care shelters include language translators (foreign language and sign language), drawn from American Red Cross staff and volunteers, as well as from community and government partners. The American Red Cross also maintains contracts for its mass care staff with electronic translation service providers (e.g., AT&T Language Line and Google Translate) to assist in providing translation services. There are also signs and posters (e.g. picture boards) that allow shelter residents to point to various pictures to help identify needs for those needing translators. Other shelter signage is posted in the languages spoken in the shelter.

In general, the American Red Cross stations a translator at the registration desk of its shelters, and the translator helps greet people arriving at the shelter and helps to assess immediate needs of those arriving at the shelter. This also informs incoming shelter guests of the presence of someone on site that speaks their language. The shelter staff will generally introduce shelter residents to others in the shelter speaking the same language so that they can find others that can help them in the shelter. In addition, one of the specific protocols for American Red Cross Health Service staff is for the staff to do a "cot to cot" walk through to talk to each shelter resident. That action provides another opportunity to assess language needs of the shelter residents.

A second context in which IEMA-OHS may have interactions with members of the general public is at a Multi-Agency Resource Center, or MARC, which is a temporary event organized by IEMA-OHS in conjunction with disaster-impacted local jurisdictions, at which representatives from multiple federal, state, and local governmental entities are present to provide information about disaster-related services to affected residents. For MARCs, IEMA-OHS typically relies on the local jurisdictions, because of their greater familiarity with the local population and its specialized needs, to identify the likely needs for language services and help IEMA-OHS to ensure that those needs are met.

In view of the services already available through the American Red Cross and from local jurisdictions as just described, IEMA-OHS will continue to assess the need for advisory notices of language access services, picture boards and the like, across all of IEMA-OHS's programs and services, and each program will make recommendations to the Director regarding next steps to be taken to meet any identified needs.

As part of any advisory notices, the telephone numbers to call to file a complaint if an individual believes he or she has been discriminated against shall also be posted at any locations where language access-related signage is determined to be necessary and appropriate. These are: Voice 217-782-3184; TTY 888-614-2381.

## 5. Language Assistance Services and Protocols

IEMA-OHS language assistance services and protocols that may be included in the future:

- Bilingual staff
- Oral interpretation services
  - o Interpreters/Bilingual Staff
  - o Telephone interpreter lines
  - o American Sign Language interpretation
  - o Teletype Device (TTY)/Telecommunication Device for Deaf (TDD)

### Bilingual Staff

As noted above, based on the results of IEMA-OHS's language fluency survey, IEMA-OHS currently has at least six staff members who are fluent in Spanish, as well as staff members who are fluent in American Sign Language, Arabic, Korean, Hindi, Urdu, Punjabi, Hausa, and Nigerian Pidgin. In collaboration, the IEMA-OHS Chief of Staff, Language Access Coordinator, and Personnel and Labor Relations Administrator will make recommendations to the Director of IEMA-OHS regarding the potential for utilizing IEMA-OHS staffs bilingual capabilities consistent with the Personnel Code, collective bargaining agreements, and applicable personnel rules.

### Interpretation

Interpretation is the rendering of one spoken or signed language into that of another language. Interpretation services include telephonic and face-to-face interpretation as well as sign-language interpretation. A state master contract for procuring interpretation services exists for all state agencies, including IEMA-OHS. The contract is with two vendors: Propio Language Services, and Multilingual Connections LLC. The agency will need to enter into a release off the master contract prior to utilizing these services.

Per the state master contract, Propio Language Services provides three-way phone interpretation. See "Telephonic Interpretation" section below for information on how to access Propio's services. Per the state master contract, Multilingual Connections provides interpretation services at public meetings/hearings, legal meetings/hearings, and other legal proceedings, conferences, workshops, training sessions, and other direct person-to-person interactions. Requests for interpretation services from Multilingual Connections can be made by calling 773-292-5500. Requests should

be made at least 4-6 weeks in advance and assure that a release off the master contract was completed.

The Public Information Officer (PIO) will assess IEMA-OHS's anticipated interpretation, and translation needs and will determine which division(s)/office(s) are most likely to utilize services from Propio Language Services and Multilingual Connections. The PIO will work with the IEMA-OHS Fiscal and Procurement as needed to ensure the agency has authorized release orders from the master contracts prior to usage. The PIO will properly manage and administer the releases of the two master contracts. IEMA-OHS also will designate points of contact from other Divisions or Offices that are likely to use the services under these two contracts.

#### Interpreters or Bilingual Staff

- IEMA-OHS may provide interpreters or bilingual staff for LEP individuals seeking IEMA-OHS services.
- An individual with LEP may provide an interpreter of his or her own choosing at his or her own expense. Extra caution should be exercised when the LEP person chooses a minor as the interpreter. While the decision of an individual with LEP should be respected, there may be issues of competency, confidentiality, or conflict of interest when the choice involves using children as interpreters.
- The interpreter should be used as a supplement to the interpreter services provided by IEMA-OHS.
- Secondary Sources of Interpreters: If there are no available IEMA-OHS staff who can serve as interpreters, the contracted vendor for such services should be contacted.

#### Telephonic Interpretation

Telephonic Interpreter Services (TIS) are made available for all in-person and telephone contact with the public. These services are readily available. If a member of the public visits or calls IEMA-OHS and does not speak English or Spanish, Propio Language Services should be contacted for interpretation services by taking the following steps.

#### Using Telephone Interpretation Line

**Dial: 1-866-828-3280**

- When prompted
  - Enter Client ID: 3847 – Illinois Emergency Management Agency & Office of Homeland Security
  - Enter your 10 digit phone number followed by pound (#)
  - For a Spanish interpreter – Press 1
  - For all other languages – Press 8
    - Enter the 2-digit language code (see Language Interpretation Directions, attached)

- Provide to agent:  
Caller's first name and initial of last name  
For 3-way calls:  
Ask the first person who answers (interpreter or call coordinator) to place the call.  
Back-Up Interpreter Number: 1-866-386-1284  
(Only use if interpreter is unavailable at primary number above)

#### Telephonic Interpretation Feedback Mechanism

Questions, concerns, or feedback with regard to the telephonic interpreter session, including the quality of the telephonic interpretation, should be made directly to IEMA-OHS Procurement, or upon designation of the contract manager for IEMA-OHS's interpretation and translation contracts, to that individual.

#### American Sign Language Interpretation

American Sign Language (ASL) interpretation services is provided by Multilingual Connections LLC. Requests for ASL interpretation services should be made at least 4-6 weeks in advance. Requests can be made by calling 773-292-5500 or via email at [translations@mlconnections.com](mailto:translations@mlconnections.com).

Staff must not require an individual to provide his or her own sign language interpreter. If it is determined that qualified sign language interpretation services are to be procured the cost will be assumed by the requesting area.

#### ASL Interpreter Feedback Mechanism

Questions, concerns, or feedback with regard to the telephonic interpreter session, including the quality of the telephonic interpretation, should be made directly to IEMA-OHS Procurement, or upon designation of the contract manager for IEMA-OHS's interpretation and translation contracts, to that individual.

Complaints may also be made to:

Illinois Deaf and Hard of Hearing Commission (IDHHC)  
Attn: Interpreter Complaint Department  
528 South 5th Street, Suite 209  
Springfield, IL 62701  
Voice: 877-455-3323 or 217-557-4495\*  
Video Phone: 217-303-8010  
TTY: 888-261-2698 Fax: 217-557-4492

<https://www.illinois.gov/idhhc/community/Pages/InterpreterComplaint.aspx>

\*For individuals calling the "voice" number, IDHHC calls are directed through the Federal Communications Commission's video relay system to accommodate Deaf staff.

### Teletype Device (TTY)/Telecommunication Device for Deaf (TDD)

A TTY and TDD are auxiliary aids and services for individuals with hearing impairments. A relay system makes it possible for individuals who are deaf to use TTYs to call other people who may not have a TTY. Illinois has the Illinois Relay Center (IRC), also known as "Dual Party Relay." IRC is a 24-hour-a-day, seven-day-a-week service which provides a communications link between those who use a TTY and those who use a standard voice telephone. Those using a TTY can reach IEMA-OHS by dialing 888-614-2381.

### Translation

The Agency should consult with their Agency's Procurement section to determine if there is an agency approved release prior to requesting vendor to provide services. Translation is the written or text-based rendering of one language into that of a secondary language. There are two mechanisms by which IEMA-OHS documents can be translated into foreign languages. For larger documents, such as reports, brochures, fact sheets, etc., IEMA-OHS offices should contact Multilingual Connections, per the state master contract. Multilingual Connections provides translation services in over 100 languages. The documents can be emailed, and a vendor representative will respond with costs, etc., or you can call the main number to speak with someone about the service. You will need to provide billing contact information, including the person's name, e-mail address and phone number. Invoices will be e-mailed to this contact. You should reference that you are ordering off the CMS master contract (CMS4819290).

Multilingual Connections, LLC.  
[translations@mlconnections.com](mailto:translations@mlconnections.com)  
773-292-5500 option 2

For smaller or urgent translations into Spanish (smaller meaning a change in a sentence on a form or a paragraph, and urgent meaning news releases that need to go out as soon as possible), the document should be emailed to IEMA-OHS's Public Information Officer (PIO). The PIO will coordinate the translation of the document.

### In-House Translation Review and Feedback Mechanism

Employees reviewing translations and/or those requesting internal reviews should follow these guidelines to ensure quality.

The process can be divided into three broad steps,

#### 1. Preparing materials.

- The English text is evaluated for readability, clarity, and cultural appropriateness.
- Ensure
  - Correct reading level,
  - Language is simple and clear,
  - Messages and illustrations are culturally appropriate,
  - Translatability of the English document, and

- Document is appropriately formatted for accessibility.
  - If your materials will be distributed in hard copy (Word, PDF, etc) they should be formatted so that they can be made available upon request in formats that are accessible to individuals who use assistive technology as required under the Americans with Disabilities Act and Section 504 of the Rehabilitation Act.
- Document prints clearly in black and white if it will be posted on the internet for public download.
- If contact information is listed, program must have capacity to interface with people who are LEP. In most cases, having Telephonic Interpreter Services solves the issue. The availability of such services should be listed on your materials.
- Whenever possible and appropriate, you should have your English materials field-tested prior to getting them translated.
- English version of the document is submitted to the IEMA-OHS Language Access Coordinator for review and approval.
- A translator is identified. Generally, translation services are to be provided by Multilingual Connections.

## 2. Translation.

- The initial translations is performed.
- The program staff should discuss the following with the translators:
  - Purpose of the material
  - Appropriate reading level of the target population
  - Key health messages, and
  - Terminology specific to the message.
- The translator needs to be encouraged to ask questions, because the quality of the translation is dependent upon the translator's understanding of the English document.
- A conceptual translation should be used, as opposed to a word-for-word, sentence-by-sentence translation. This method allows the translator to select from a variety of ways to express the message to the target audience. The use of a non-literal methodology conveys the intended message in a more culturally relevant way than the use of literal or a word-for-word translation.
- Use two translators, one for the initial translation and the second to review and edit the translation, checking for accuracy, tone, and appropriateness. The translation is given to a second translator who will check style, grammar, accuracy, and comprehension of the messages. The second translator will also review the literacy level of the translation.
- If Multilingual Connections is to be contracted for translation services, ensure that editing by a second translator is provided and that this cost is included in the price estimate.

## 3. Revision/Editing.

- "Back-to-English" translation is not recommended as an effective method to ensure effectiveness.
  - Translated materials, too, should be field-tested. A simple way of doing this is by working with community providers, community members, and/or bilingual IEMA-OHS staff. They can review your documents and provide valuable input.
4. Translation Assistance Provided by Illinois Department of Innovation and Technology (DoIT)

DoIT provides translation services for web pages through an embedded widget on the IEMA-OHS website utilizing a vendor, WeGlot, this service provides translation for 6 languages including Arabic, Hindi, Simplified Chinese, Spanish, and Tagalog. WeGlot is a web-based translation tool that enables websites and applications to translate content into multiple languages with the option to allow for a "human in the loop" to correct any automatically generated translations, allowing users to customize translations to suit the specific context of words or phrases.

In addition, DoIT offers a service to enable agencies to translate documents i.e. downloadable content, (word and PDF) from English into six primary languages identified by the Governor's Office.

IEMA-OHS will continue to follow the development and availability of these additional language access services in order to utilize them for purposes of this LAP.

## V. Vital Document Translation

IEMA-OHS will engage in the process of identifying vital documents, webpages, etc., with the goal of identifying all such documents by July 1, 2026. The U.S. Department of Justice has said that a document is "vital" if it "contains information that is critical for obtaining . . . services and/or benefits or is required by law." Vital written documents can include consent and complaint forms; intake and application forms with the potential for important consequences; written notices of eligibility criteria, rights, denial, loss, decreases in benefits or services; hearing notices; notices advising LEP persons of free language assistance; and written tests that test for competency for a license, job, or skill for which knowing English is not required.

Once IEMA-OHS identifies vital documents in need of translation, they will examine the feasibility of translating such documents, subject to fiscal constraints. For example, this may be an appropriate use for the DoIT Document Translation Application. IEMA-OHS will strive to translate vital documents, with an initial focus on Spanish translations in order to accommodate the largest identified LEP population in Illinois.

## VI. Staff Training

IEMA-OHS will train supervisors, managers and staff regarding their LAP responsibilities. IEMA-OHS will also make all IEMA-OHS staff aware of this LAP. This LAP will be posted on the agency's intranet for accessibility and will also distribute via agency wide email. The LAC will work with HR to implement LAP training as part of new hire orientation for all new

employees and help develop individual training plans within each division and section to further ensure every employee is aware of this LAP and is in compliance with its policies and procedures. The primary goal of training is to understand the need for this LAP and awareness of tools and resources available to assist persons with LEP.

#### VII. LAP Monitoring

IEMA-OHS will conduct an annual review of the LAP to determine if any changes or modifications are necessary. The reviews will include an analysis of any changes in language needs of the population served by IEMA-OHS, determination of any additional changes to documents or resources and the feasibility and cost of implementing those changes. The LAP will be revised as necessary based on the results of each review.

#### VIII. Data Collection

To better understand the need for translation services and staff, IEMA-OHS will work with DoIT to implement a bilingual assessment tool and tracking system to collect the following information: date, event, location, number of people encountered, number of people with limited English proficiency encountered, languages encountered, services needed, and type of interaction. The collection of this data will assist IEMA-OHS in analyzing which portions of the state require more translation services to better prepare employee to assist persons with LEP when deploying to those areas. Data collected will also serve to possibly influence the fiscal need to support language certification for bilingual employees as well as the need for greater translation services. This data collection requirement will be included in training for all existing and new employees.

#### IV. LAP Complaints

In the event that a person wishes to file a complaint regarding an alleged violation of the parameters of this LAP (with respect to IEMA-OHS), he/she should file a complaint with the IEMA-OHS Language Access Coordinator within six (6) months of the alleged violation. A written complaint must be filed. To file a complaint with the IEMA-OHS Language Access Coordinator, submit the written complaint to:

Eileen Figueroa  
Illinois Emergency Management Agency & Office of Homeland Security  
2200 South Dirksen Parkway  
Springfield, Illinois 62703  
Phone: 217-299-3312  
[EMA.LanguageCoordinator@Illinois.gov](mailto:EMA.LanguageCoordinator@Illinois.gov)

IEMA-OHS intends to create an electronic complaint form, in fillable PDF format, accessible from the home page of IEMA-OHS's website (<https://iemaohs.illinois.gov/>) in English and the six primary non-English languages among the LEP population as identified by the Governor's Office. IEMA-OHS will endeavor to work with other state agencies in the preparation and translation of an appropriate form, so as to provide consistency across state agencies and to provide a means for sharing of translation costs. In addition, this may be another appropriate use for the DoIT Document Translation Application.

APPROVED:

Theodore Berger, Acting Director  
Illinois Emergency Management Agency & Office  
of Homeland Security

DATE:

# Language Interpretation Directions

## PROPIO LANGUAGE SERVICES, LLC

- Dial: 866-828-3280 (Alternate Toll-Free Number: 866-386-1284)
- Enter 4- digit agency number: 3847
- Enter your 10 digit phone number followed by pound (#)
- Select language:
  - Select 1 for Spanish – or –
  - Select 8 for other languages
    - Enter the appropriate 2-digit code (see language code card below)
    - or-
  - Press 99 to connect to a live attendant for help or when language is unknown

### Language Code Card:

Language	Code	Language	Code
Albanian	47	Korean	30
Amharic	39	Laotian	50
Arabic	23	Mandarin	24
Bosnian	37	Nepali	25
Burmese	21	Polish	42
Cantonese	31	Portuguese	35
Chin	32	Punjabi	49
Farsi	33	Russian	27
French	26	Somali	29
Haitian Creole	28	Spanish	1
Hindi	43	Swahili	38
Hmong	44	Tagalog	46
Karemi	60	Urdu	41
Karen	34	Vietnamese	22