



**ILLINOIS HOUSING**  
DEVELOPMENT AUTHORITY

**Illinois Housing Development Authority**

# Language Access Plan:

*Overview of Standards, Current Systems, and Practices*

State of Illinois

Office of New Americans



February 13, 2026

# TABLE OF CONTENTS

<b>Section 1: Introduction and Background</b>	<b>3</b>
1.1 Agency Overview	3
Introduction	3
IHDA’s Role	3
IHDA’s Language Access Efforts	9
1.2 Language Access Plan Legal Basis and Purpose	9
Purpose and Goals	9
Authority	10
Guiding Principles	11
Definitions	12
<b>Section 2: Needs Assessment</b>	<b>15</b>
2.1 Four-Factor Analysis	15
<b>Section 3: Staffing and Coordination</b>	<b>23</b>
<b>Section 4: Language Assistance Services Plan</b>	<b>24</b>
4.1 Language Need Identification	24
4.2 Hiring/Contracting Qualified Interpreters for In-Person Communication	25
4.3 Hiring/Contracting Qualified Interpreters for Virtual Communication (Over-the-Phone or Video)	26
4.4 Employing/Utilizing Bilingual or Multilingual Staff	27
4.5 Translation of Vital Documents and online Content	27
4.6 Development and Distribution of Multilingual content in Other Formats (Public Service Announcements, Radio Messaging, Social Media Information)	28
<b>Section 5: Notification of Language Assistance Services Plan</b>	<b>29</b>
<b>Section 6: Language Access Training Plan</b>	<b>30</b>
<b>Section 7: Concern Resolution Process</b>	<b>31</b>
<b>Section 8: Monitoring, Evaluation, and Reporting Plan</b>	<b>32</b>
<b>Section 9: Resources</b>	<b>34</b>
<b>Section 10: Appendix: Vital Documents</b>	<b>34</b>

## SECTION 1: INTRODUCTION AND BACKGROUND

### 1.1 AGENCY 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 Housing Development Authority’s (the “Authority” or “IHDA”) action plan for the next two years for language access implementation, a timeline selected to achieve greater alignment with the Illinois Language Equity and Access Act. Section 1 of the Language Access Plan provides an overview of IHDA and establishes 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 four 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 IHDA Systems and Practices:** A description of IHDA’s current practices, existing infrastructure, and/or progress to date in relation to the standard. Implementation Goals and a 2-Year Action Plan are provided to support agency implementation.
3. **Implementation Goals:** An overview of the overarching goals IHDA will pursue to meet compliance objectives.
4. **2-Year Action Plan:** A list of action items IHDA hopes to implement in the coming two years.

---

#### IHDA’S ROLE

The Authority is a body politic and corporate of the State of Illinois (the “State”), created by and existing under the Illinois Housing Development Act, 20 ILCS 3805/1 et seq., as

supplemented and amended, and was created to finance and provide access to decent, safe, and sanitary housing affordable to residents of low and moderate income within the State of Illinois – its “Mission.”

IHDA’s primary website is: <https://www.ihda.org/>

IHDA’s Language Access Coordinators are:

Dr. Tiffany Davis  
Special Advisor on Equity and Inclusion  
Illinois Housing Development Authority  
111 E. Wacker Drive, Suite 1000  
Chicago, Illinois 60601  
languageaccess@ihda.org  
General: 312-836-5200  
IP Phone: 872-271-8048

Vanessa Hill  
Special Assistant to the Executive Department  
Illinois Housing Development Authority  
111 E. Wacker Drive, Suite 1000  
Chicago, Illinois 60601  
languageaccess@ihda.org  
General: 312-836-5200  
IP Phone: 872-271-8137

IHDA Divisions and Offices:

i. Accounting

This department maintains the Authority’s financial books and records, issues financial reports and ensures that there is adequate control of assets.

ii. Asset Management

The Asset Management department is responsible for ensuring effective and efficient program administration and long-term compliance (financial, physical, and operational) for the largest portfolio of affordable multifamily rental housing in the state of Illinois. The

Asset Management department works in partnership with property developers, owners, and managers, as well as other funders and interagency groups.

### iii. Communications

This department handles overall external communications and other public information affairs of the Authority. Its goal is to increase knowledge and favorable attitudes toward the Authority among business and financial leaders, the media throughout Illinois, community interest groups, government leaders and the public.

### iv. Community Affairs

The Community Affairs department oversees a portfolio of programs directed towards promoting and creating fiscally stable households and communities. The department coordinates with external partners, including units of local government, HUD-certified housing counseling agencies, community-based organizations, community action agencies, regional planning commissions, and land banks, and works with staff across IHDA departments to identify and provide input for the design of program initiatives.

### v. Executive

The Executive department is comprised of the Executive Leadership team responsible for the administration of the Authority and supporting staff positions.

### vi. Finance

The Finance department is responsible for raising capital and funding related to both single-family and multi-family housing in the State of Illinois. In addition, the department advises and sources long-term financing and investments, conducts risk management evaluations, and supports other departments at the Authority in making strategic decisions.

### vii. Homeownership

The Homeownership department is responsible for all production and servicing activities offered by the Authority related to single-family homeownership including, but not limited to, down payment assistance, closing cost assistance, and mortgage financing loans to single-family residential homebuyers across the State. Homeownership also provides training and technical assistance to lenders, servicers, Realtors, non-profits, borrowers, and municipal staff that participate in the Authority's programs or share these programs with

their clients or constituents. Homeownership works through the Authority's lender network and neither originates any first position purchase-money loans nor leads potential borrowers through the loan approval process.

#### viii. Human Resources

This department is responsible for developing, implementing and coordinating policies and programs encompassing all aspects of human resource management, including employment, employee relations, wage and salary administration, training, placement, safety and health, benefits, employee services, affirmative action, equal employment opportunity, policies and procedures, Workers' Compensation, Unemployment Insurance Programs, and oversight of IHDA's only physical reception area.

#### ix. Information Technology

The Information Technology department ensures IHDA colleagues, partners and Illinois residents have access to the technology needed to achieve IHDA's mission of "Financing the creation and preservation of affordable housing in Illinois" with a focus on usability, efficiency, and cost effectiveness. The department directs the procurement, development, implementation, enhancement, support, and security of all IHDA's information systems used to conduct the Authority's business activities. The department is also responsible for managing the Authority's Continuity of Operations Plan (COOP) and for maintaining compliance with all applicable security laws, regulations, and policies.

#### x. Internal Audit

The purpose of IHDA Internal Audit department is to provide independent and objective assurances as well as consulting services designed to add value and improve organizational operations. The department helps IHDA accomplish its mission by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control, and governance processes.

#### xi. Legal

IHDA Legal has a wide range of duties and responsibilities, providing legal support for every aspect of IHDA's operations. Legal is led by IHDA's General Counsel, who reports directly to IHDA's Executive Director. There are five teams within IHDA Legal. The role of each team is described in more detail below.

Real Estate Transactions Team

The professionals in this team have duties that center around providing legal services focused on multifamily real estate/affordable housing finance to IHDA's Multifamily Finance department, Asset Management department, and structured finance professionals.

Community Programs Team

These team members have duties that center around providing grant issuance and grant management legal services to IHDA's Community Affairs department, Strategic Response department and SPAR department.

Homeownership Programs Team

This team has duties that center around providing legal services to IHDA's Homeownership department.

Procurement Team

These professionals have duties that center around supporting IHDA's purchase of goods and services.

General Corporate & Compliance Matters

The balance of the professionals in Legal have duties covering a wide array of subject matter including but not limited to FOIA, ethics, corporate governance, litigation, audit, open meetings act compliance, employee relations, contracts, legislative matters etc.

xii. Multifamily Financing

Responsibilities of the Multifamily Financing department include: analysis, underwriting and review of funding proposals for the development or preservation of affordable multifamily housing throughout the State that may require IHDA resources; marketing and promoting the Authority's multifamily loan programs; developing production goals/policies, allocation and underwriting criteria; formulating and implementing strategies for the use of the various state housing resources in concert with IHDA financing; presentation of funding requests for review by IHDA's Loan Committee and Authority Board; managing the application process for the Illinois Affordable Housing Trust Fund, the Authority's Financial Adjustment Factor Funds (FAF) and HOME Program; monitoring of construction work in conjunction with IHDA financing to determine compliance with the various program rules; allocation of the State's portion of federal Low Income Housing Tax Credits and the Illinois Affordable Housing Tax Credit program.

### xiii. Operational Excellence

The Operational Excellence department is responsible for establishing and maintaining a cross-functional culture of business excellence, ensuring business operations are efficient and effective, and resources are properly managed. This department collaborates across multiple IHDA departments at the direction of IHDA leadership to implement and maintain the principles of operational excellence.

### xiv. Strategic Planning and Reporting

The Strategic Planning and Reporting department provides overall coordination and staffing for the development of the State's annual federal and State required housing plans and performance and progress reports. This department plays a critical role in providing data analysis, policy research and policy development to inform funding priorities. Department staff also represent the Authority on several public advisory groups.

### xv. Strategic Response

The Strategic Response unit currently administers and manages the online application process for the Illinois Court Based Rental Assistance Program, and manages all contacts with applicants and landlords. In addition, the unit supports the Authority's general reception and rental assistance phone lines, which provide information on IHDA's services, programs, and activities while connecting the public to statewide resources. The unit also manages the Rental Housing Support Program, delivering rental assistance to extremely low-income households residing in participating properties.

Of the various departments that comprise the Authority, the following interact with individuals in the public including LEP individuals:

- Community Affairs
- Homeownership
- Strategic Planning and Reporting
- Strategic Response

---

**IHDA'S LANGUAGE ACCESS EFFORTS:**

The mission of the Authority is to create and finance affordable housing for residents of the State of Illinois. The Authority primarily works with third-party intermediaries and partners to administer and operate its programs at the local and individual level. Given the non-public facing nature of the Authority, interactions with LEP individuals, and other individuals in the general population, are limited.

Nevertheless, the Authority is committed to making its services, programs, and activities, and information about them, available to all Illinois residents, regardless of English proficiency. Accordingly, the Authority is committed to making every reasonable effort to ensure Limited English Proficient ("LEP") individuals have meaningful access to the Authority's services and programs. An LEP individual has meaningful access when he, she, or they:

- Is/are given adequate information about the nature of the program or service;
- Can understand the services and programs available;
- Can receive the services or access programs for which he, she, or they are eligible; and
- Can communicate the relevant circumstances of his, her, or their situation to the Authority.

## 1.2 LANGUAGE ACCESS PLAN LEGAL BASIS AND PURPOSE

---

**PURPOSE AND GOALS**

This Language Access Plan aims to provide guidance to IHDA 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 IHDA into compliance with Illinois's Language Equity and Access Act (Public Act 103-0723), 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

### ***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 Authority 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 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).

### ***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.<sup>1</sup>

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

Signed into law by Governor Pritzker in 2024, the Language Equity and Access Act 2024 aims to ensure that all residents can access state information, programs, and services equitably, and that limited English proficiency does not prevent anyone from fully participating in civic life.<sup>2</sup> The Act aims to ensure all Illinois residents, including individuals with LEP, have meaningful and equitable access to state services, programs, information, and activities by removing language barriers. The act incorporates federal guidance for ensuring meaningful access for individuals with LEP and other federal and state legislation

---

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

<sup>2</sup> See *Language Equity and Access Act*, Public Act 103-0723, 103rd Gen. Assem. (Ill. 2024), <https://www.ilga.gov/legislation/publicacts/fulltext.asp?Name=103-0723>.

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.<sup>3</sup>

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

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

---

## **GUIDING PRINCIPLES**

In accordance with federal and state requirements, including the Illinois Language Equity and Access Act (Public Act 103-0723), this Language Access Plan provides a framework for ensuring IHDA can deliver timely and meaningful language assistance services to IHDA's constituents with LEP. IHDA is committed to providing equitable language access to its services, programs, and activities for all individuals, regardless of the language they use. IHDA 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.
- Taking reasonable steps to serve all individuals with LEP and providing accurate, timely, and effective communication, including oral and written language services needed to assist persons with LEP to communicate effectively, and providing them with equal opportunity to participate fully in the services, activities, or other programs administered by the state. This includes displaying public notices in commonly spoken languages that communicate the availability of free language assistance services and how to access them.
- Conducting a regular assessment that describes the population of persons with LEP the agency serves, the policy and programmatic actions implemented to ensure meaningful access, and the metrics used to measure compliance with the Language

---

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

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, costs, and operational requirements.

- Strengthening IHDA'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.
- Establishing mechanisms available within regular operations to track progress across public facing areas of IHDA to meet language access compliance standards. This includes collecting and reporting available data on the use interpretation and translation vendor services, including volume, language type, and service type. IHDA will maintain a complaint and review process and make all reasonable efforts to ensure timely resolution.
- Provide ongoing employee development and training to maintain well-trained multilingual employees and general staff. IHDA will also collect and report aggregate data on multilingual staff roles, language certifications, and language capacity across its workforce while maintaining staff privacy.
- Ensuring the Language Access Plan and related materials are publicly available through IHDA's website and other accessible formats.

---

## DEFINITIONS

- **Compliance Evaluation Framework:** an evaluation methodology involving the Language Assessment Rubric and Reporting Tool which the Statewide Manger for Language Access will use to monitor the compliance of State Agencies.
- **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
- **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.
- **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.

- **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.
- **Individuals with LEP:** individuals who self-identify as speaking English less than “very well” according to the U.S. Census American Community Survey.
- **Interpretation:** the act of listening to 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.
- **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.
- **Language Access Coordinator (LAC):** staff of a State Agency tasked with coordinating and overseeing the entity's language access implementation activities and coordinates and oversees the Language Access Liaisons to ensure that language access information is shared across all state agency programs and divisions.
- **Language Access 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.
- **Language Assistance Services (LAS):** 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.
- **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 Service Provider (LSP):** a vetted contractor/vendor contracted to perform language assistance services, such as interpretation and/or translation, for individuals with LEP.
- **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.
- **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.
- **Multilingual Staff:** staff member who has proficiency in one or more language other than English and provides language assistance services such as interpretation and/or translation to individuals with LEP.
- **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.

- **Plain Language:** a style of communication that aims to make written or spoken information easy to understand for a broad audience. The Plain Language Act (2010) defines Plain Language as “clear, concise, well organized, and follows other best practices appropriate to the subject or field and intended audience.”<sup>4</sup> Language intended for public consumption avoids non-essential information and complex phrasing; highlights essential information; avoids the use of technical terms and industry jargon; and simplifies complex information.
- **State Agency:** any State of Illinois agency, board, or commission, directly responsible to the Governor, which provides direct or indirect services, resources, programs, information, data, policies, instructions, or activities to the public, Funded Entities, and staff.
- **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.
- **Tier I State Agency:** State Agencies that have primary responsibilities that involve providing direct or indirect services and information to the public and have 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 relatively medium-to-small staff, budget, and/or operational scope.
- **Tier III State Agency:** State Agencies that do not have primary responsibilities that involve providing direct or indirect services and information to the public, though they may provide information to the public.
- **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.
- **Vital Documents:** paper or electronic written material that contains information that affects a person's access to, retention of, termination of, or exclusion from program services or benefits or is required by law.

---

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

## SECTION 2: NEEDS ASSESSMENT

Illinois is home to a diverse population with cultural and linguistic backgrounds from around the world. To support IHDA 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 IHDA.

A four-factor analysis is used in this section as a framework to determine the language services IHDA 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<sup>5</sup>:

1. Factor 1: Data collection and analysis of the population with limited English proficiency
2. Factor 2: Data collection and analysis of languages encountered
3. Factor 3: Services Provided to General Public and/or Prospective Limited English Proficient Users
4. Factor 4: Budget and Available Resources

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

### 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 IHDA's services.

---

<sup>5</sup> 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>

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 reasonable 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 IHDA 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.

### **Current IHDA Systems and Practices**

In 2025, IHDA is using the following findings from a demographic analysis<sup>6</sup> 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.
- Eleven languages have more than 10,000 limited-English speakers in Illinois, including:

---

<sup>6</sup> 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://arcg.is/1Py4n0>.

<b>Largest Language Groups and Largest Limited-English Language Groups in Illinois: 2018-2022</b>			
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 IHDA's services, programs, or activities.

The Illinois Language Equity and Access Act require State agencies to conduct an individualized assessment as part of their 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 IHDA's ability to identify language access needs and ensure meaningful access.

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

- Track the total number of incoming calls across all public-facing phone lines, including main reception, the rental assistance phone line, and Homeownership phone line.
- Track the number of incoming calls initiated by a LEP individual and the specific language requested.
- Track the number of times it has utilized Propio or Multilingual Connections, noting the purpose—whether Interpretation or Translation—and the language requested.
- Track the total number of visitors to the four websites it maintains or co-maintains as well as the number of visitors who choose to view the site in each available language.
- Human Resources department is tasked with assessing and maintaining records of all Authority staff who provide multilingual services to the public and specifying the languages in which they are proficient.
- The Language Access Plan Coordinator will track the number of language access request form submissions and language access complaint form submissions as well as resolutions.
- The Language Access Plan Coordinator and the Authority's Legal department will collect data as identified in this plan and gather with all identified departments to share information and review this Language Access Plan annually.

## Current IHDA Systems and Practices

The Authority records the number of individuals seeking Language Assistance Services who visit its physical office and the language the LEP individual speaks. The Authority monitors the total number of incoming calls across all internal public-facing phone lines, including main reception, the rental assistance phone line, and the Homeownership phone line. The Authority also tracks the number of incoming calls initiated by LEP individuals and the specific language requested. Additionally, the Authority tracks the number of times it utilizes Propio or Multilingual Connections, noting the purpose—whether Interpretation or Translation—and the language requested.

The Authority tracks the total number of visitors to the four websites it maintains or co-maintains, as well as the number of visitors who choose to view the site in each available language. The data is submitted to the Language Access Coordinator for compiling and aggregating.

---

### 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 IHDA.

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, IHDA will outline procedures for prioritizing language assistance for vital and urgent information and activities. IHDA 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 IHDA Systems and Practices

Given the non-public facing nature of the Authority, interactions with LEP individuals, and other individuals in the general population, are limited. As more fully described below, the Authority primarily works with third-party intermediaries and partners to administer and operate its programs at the local and individual level.

Those LEP individuals who do interact with the Authority have been identified through a totality of the circumstances. The individual either self-identifies as LEP or their LEP is discerned by the staff member based on the nature of the interaction.

The Authority interacts with LEP individuals in four ways: (1) in-person, (2) telephonic, (3) electronic, and (4) mail.

### 1. In-Person Engagement at Authority's Physical Address

Most individuals interacting with the Authority, whether LEP or not, do not physically visit its offices at 111 E. Wacker Drive in Chicago. In rare instances when someone does visit the office, reception staff are provided a list of Multilingual Staff along with the non-English language(s) they speak and information on how to access Propio. At the reception area—the initial point of contact—signage is displayed to inform LEP individuals of the availability of Language Assistance Services and how to request them. The notice signage is displayed in Spanish, Polish, Arabic, Korean, Hindi, Tagalog, Portuguese, and Mandarin. Additionally, an “I Speak” card is available to help staff identify an LEP individual's Primary Language.

LEP individuals who visit the office and request Language Assistance Services are served by staff who speak their preferred language, either in-person or by phone. The Authority has a significant number of staff members fluent in Spanish and one staff member fluent in Polish. The Authority does not have a formal certification process. However, certain staff members have self-identified as multilingual and volunteered to provide language assistance. For languages other than Spanish and Polish, or when Multilingual Staff are unavailable to assist in-person or by phone, the Authority relies on Propio to provide real-time Interpretation.

### 2. Telephonic

The Authority maintains a main phone line for general inquiries as well as certain department or program specific public facing phone lines. The Authority has several staff members ready to receive these calls at any one time. Each public facing phone line has

Spanish speaking staff available. Authority staff answering telephone calls during business hours identifies the language spoken by the LEP individual and routes the call to the appropriate Multilingual Staff or utilizes telephonic interpretation through Propio. To ensure these calls are routed properly, a list of Multilingual Staff and the language(s) they speak is accessible to reception staff.

The Authority has taken steps to implement software solution SimpliTTY provided by the Illinois Department of Information Technology to facilitate TTY services for individuals with hearing impairments and continues to work with DOIIT to achieve full functionality.

### 3. Electronic

The Authority currently maintains or co-maintains four public facing websites:

- The Authority’s main website, [www.ihda.org](http://www.ihda.org), has been available in Spanish since August 2013. In 2023, the Authority implemented the WordPress plug-in tool “GTranslate” which utilizes Google to automatically translate the website into 103 different languages. The default language shown is English and users then scroll to select any of 103 languages. Although the placement of this tool is currently at the bottom of the website landing page, once the website is redesigned, this tool will be moved to a more prominent location within the landing page. The main website also includes a dedicated language access webpage providing users with notice of the availability of Language Assistance Services, an online language access request form, and an online complaint form.
- The Authority’s homeownership website, [www.ihdamortgage.org](http://www.ihdamortgage.org), contains information on the Authority’s mortgage products for home buyers and partner lenders. This website can be translated into 103 different languages using the Google Translate plug-in tool.
- The Authority administers the website, [www.illinoishousinghelp.org](http://www.illinoishousinghelp.org), that includes information on the Court Based Rental Assistance Program for tenants, landlords, and partners in English and Spanish. This website is available in Arabic, Chinese, French, German, Hindi, Polish, Portuguese, Spanish, and Tagalog.
- The Authority co-administers the website, [www.illinoishousingsearch.org](http://www.illinoishousingsearch.org), a free online resource for renters and property providers in Illinois to search for affordable, accessible, and market-rate housing, which is available in multiple languages using the Google Translate plug-in tool.

Any electronic mail received in a language other than English is translated by appropriate staff or by using either a commercial Translation service (Google Translate, Apple Translate), Propio, or Multilingual Connections and responses are in the language of the sender.

#### 4. Mail

Like electronic mail, any correspondence in a language other than English is translated by appropriate staff or by using a commercial Translation service (Google Translate, Apple Translate), Propio, or Multilingual Connections and responses are in the language of the sender.

---

### FACTOR 4

#### **Overview of Standard**

*Budget and Available Resources* assesses the resources available to IHDA 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, IHDA 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 IHDA Systems and Practices**

The Authority provides the following types of Language Assistance Services:

- Multilingual staff (Spanish, Polish, Cantonese, Bahasa, Tamil)
- In-house interpreters (oral)
- In-house translators (written)
- Telephone Interpretation services (Over 300 languages)
- Video Interpretation services (Over 75 languages)

The Authority does not request but permits LEP individuals to use their own interpreters or rely on family members or friends, should this be their preference after being informed that free Interpretation services are available. As mentioned, the Authority has contracted with Propio to provide real-time telephonic and video Interpretation services for LEP individuals. The Authority uses Propio and Multilingual Connections to translate documents requested by an LEP individual related to the Authority's programs, services, or activities, as well as any Vital Document, if not translated by Multilingual Staff.

There is no discrete budget dedicated to Language Assistance Services. The cost of Propio and Multilingual Connections is incurred as needed. There is no additional cost for utilization of multilingual staff, apart from staff time, which IHDA has elected not to allocate as a separate expense. Current total cost of all Language Assistance Services is approximately \$1,000.00 per year.

## SECTION 3: STAFFING AND COORDINATION

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 multilingual employees, IHDA will establish internal roles to implement its Language Access Plan. These roles include two Language Access Coordinators to oversee implementation and coordination of language assistance services, in alignment with 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.

IHDA conducts programs and services in partnership with a wide network of grantees and funded entities. Therefore, IHDA will take affirmative steps to incorporate language equity compliance provisions into applicable new contracts.

## SECTION 4: LANGUAGE ASSISTANCE SERVICES PLAN

IHDA is committed to taking reasonable steps to ensure meaningful communication and access to information for IHDA's users with LEP. The Language Assistance Services section outlines the types of language assistance IHDA currently provides, as well as the services IHDA plans to provide to support meaningful communication and participation for individuals with LEP and who are limited English proficient. 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 IHDA'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 NEED IDENTIFICATION

- **Overview of Standard**

The Proposed 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 IHDA Systems and Practices**

Staff conduct an initial assessment to determine if an individual is LEP. This occurs when:

- The individual self-identifies as LEP; and/or
- The individual requests an interpreter; and/or
- At the first point of contact, Authority staff believe the individual does not speak or understand English well enough to effectively participate in the conversation or fully understand questions, responding with difficulty.

Public-facing staff then determine the need for Language Assistance Services by taking the following steps:

- The staff member asks professional, open-ended questions to assess the individual’s ability to speak or understand English. These questions require complex responses and typically begin with “who,” “what,” “when,” “where,” or “why.” Examples include: “What kind of assistance do you need from the Authority?” and “What program or service are you inquiring about?”
- If the staff member determines the individual is not proficient in speaking and understanding English, they ask whether the individual needs assistance with reading or writing English.
- If the individual makes an oral or written request for Translation or Interpretation services in a specific language, they are considered LEP.
- Once identified as LEP, the staff member assesses the type and nature of the language(s) the individual is proficient in and whether Translation services, Interpretation services, or both are required. The staff member uses the “I Speak” card available at reception.
- Although informal interpreters—such as family members or internet tools—are generally avoided, staff may use them to help assess LEP status.

The reception area at the Authority’s physical address displays notices in Spanish, Polish, Arabic, Korean, Tagalog, Mandarin, Hindi, and Portuguese about Language Assistance Services and Interpretation availability. Through an LEP individual’s use of IHDA’s language access webpage the need for Language Assistance Services is identified as well as the language spoken by the LEP individual.

---

## 4.2 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 IHDA Systems and Practices**

If in-person Interpretation services are required, the public-facing staff member identifies the needed language and refers to the list of Multilingual Staff proficient in that language. The staff member then requests the Multilingual Staff member to communicate with the LEP individual in person. If no Multilingual Staff are available for in-person assistance, the staff member arranges for phone-based support. If no Multilingual Staff are available to take the call, the staff member uses Propio for real-time Interpretation.

---

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

- **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.

- **Current IHDA Systems and Practices**

Telephonic answering staff conduct an initial LEP and Language Assistance Services needs assessment described above. During business hours, the receptionist evaluates the language assistance needs of LEP callers, transferring them to the appropriate Multilingual Staff member when available or using Propio to ensure effective communication. IHDA currently utilizes Propio pursuant to a state master contract. Any vendor utilized through a state master contract is a qualified interpreter.

---

#### 4.4 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 multilingual 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 IHDA Systems and Practices**

Multilingual Staff offer Interpretation services on an as-needed basis. A list of Multilingual Staff is provided to the receptionist and department heads. These individuals are authorized to provide Language Assistance Services. Once an LEP individual is identified and their specific non-English language determined, public-facing staff refer to the list of Multilingual Staff proficient in that language and contact the appropriate staff member to assist either in-person or by phone. If the LEP individual's needs exceed the Multilingual Staff member's ability, Propio is used. If no Multilingual Staff are available, the staff member uses Propio to provide real-time Interpretation services.

Correspondence received in a language other than English is translated into English, a substantive response is formulated, and a formal reply is translated back into the LEP individual's language.

Reasonable requests for translation of documents related to the Authority's programs or services are accommodated upon request. Notices of this availability appear on the Authority's website and on the Language Assistance Services card at reception. Staff are informed that this assistance is available to LEP individuals. If Multilingual Staff cannot accommodate a Translation request, it is sent to the Language Access Plan Coordinator, who arranges translation through Propio or Multilingual Connections. The LEP individual is advised that translation time may vary depending on the document's size and complexity.

Over the next two years, the Authority is committed to strengthening the role of multilingual staff by offering credentialing programs to employees who seek to be certified in multiple languages.

---

#### 4.5 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.

If the LEP population falls below the thresholds for requiring translation set out by the Act or ONA guidance, but an LEP individual still requires 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 IHDA Systems and Practices**

Each department is responsible for determining whether a document is a Vital Document and, with guidance from the Language Access Plan Coordinator, deciding when it should be translated and into which language. See Appendix 2 for the Authority's current list of Vital Documents and their current Translations.

Vital Documents such as complaint forms, notices of denial, applications to participate in programs or services, and documents that require a signature are translated upon request. The process begins with the LEP individual submitting a Translation request via the Authority's website. The Authority Language Access Plan Coordinator then designates the appropriate staff to coordinate with Propio or another translator to complete the document Translation, which is subsequently delivered to the LEP individual. Please note, however, that the recommended statutory forms and content of mortgages and other instruments related to mortgage financing are in English for recording purposes. Illinois law does not address whether an instrument would be accepted for recording if in another language.

The Authority's main website at [ihda.org](http://ihda.org) includes a dedicated language access webpage that notifies visitors of free Language Assistance Services. This webpage includes web-based forms to request services and submit complaints. The website [www.ihdamortgage.org](http://www.ihdamortgage.org) will link back to the main Authority site for these requests. The website [www.illinoishousinghelp.org](http://www.illinoishousinghelp.org) also enables individuals to request language access by emailing program staff directly.

---

#### 4.6 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 IHDA Systems and Practices**

As mentioned previously, the Authority’s main website, [www.ihda.org](http://www.ihda.org), implements the WordPress plug-in tool “GTranslate” which utilizes Google to automatically translate the website in 103 different languages. The default language shown is English and users then scroll to select any of 103 languages. The website also includes a dedicated language access webpage providing users with notice of the availability of Language Assistance Services, an online language access request form, and an online complaint form. Upon receipt of a request for multilingual content, the Authority takes reasonable measures to provide that content in a timely manner.

## SECTION 5: NOTIFICATION OF LANGUAGE ASSISTANCE SERVICES PLAN

In addition to providing language assistance services, the Notification of Language Assistance Services section will outline how IHDA 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 IHDA, which can increase public trust and confidence.

### **Overview of Standards**

The Illinois Language Equity and Access Act requires 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, IHDA 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 IHDA Systems and Practices

LEP individuals are informed of available Language Assistance Services in several ways. The Authority's main website at [ihda.org](http://ihda.org) includes a dedicated language access webpage that will notify visitors that the Authority offers free Language Assistance Services. This dedicated webpage will include web-based forms to request Language Assistance Services and a complaint form, discussed infra. The website [www.ihdamortgage.org](http://www.ihdamortgage.org) will link back to the main Authority site for these requests. The Strategic Response Unit maintains a dedicated webpage on [www.illinoishousinghelp.org](http://www.illinoishousinghelp.org) for Language Assistance Service requests specific to the Court-Based Rental Assistance Program that is similar to IHDA's main website.

The reception area at the Authority's physical address displays notices about Language Assistance Services in Spanish, Polish, Mandarin, Arabic, Korean, Tagalog, Portuguese, and Hindi along with a notice regarding Interpretation services.

During business hours, the receptionist evaluates the language assistance needs of LEP visitors and callers, and orally advises the LEP individual of the availability of Language Assistance Services with the assistance of Multilingual Staff or Propio as necessary.

## SECTION 6: LANGUAGE ACCESS TRAINING PLAN

IHDA is committed to providing ongoing employment development and training on language access to maintain well-trained multilingual 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 IHDA 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.

### 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 multilingual employees and general staff. This ensures IHDA is equipped to deliver effective language assistance services.

## Current IHDA Systems and Practices

The Authority trains public-facing staff on the procedures and protocols of this LAP during onboarding. Public-facing staff are employees whose routine duties involve interactions with constituents, applicants, grantees, and other intended groups. Existing public-facing staff receive training on language assistance procedures and protocols, including how to determine whether an individual needs Language Assistance Services, how to secure those services, and how to work effectively with interpreters and translators.

The Human Resources department conducts staff training on LEP procedures and protocols, guided by the Language Access Plan Coordinator and the Legal department. Additionally, the Human Resources department and the Language Access Plan Coordinator maintain records documenting staff participation in LEP training, including the dates of each training session.

## 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 IHDA 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 IHDA 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. Section 15(b)(5) of the Act 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 Section 30(c) of the Act.

## Current IHDA Systems and Practices

Individuals who believe they do not receive meaningful access to the Authority's services, programs, and activities due to language barriers can file a complaint through an online form available on the Authority's website. The complaint forms are accessible in multiple languages via the Google Translate plug-in tool. LEP individuals who contact the Authority in person are advised of the complaint procedure using the Interpretation and Translation services described above. Any mail or email correspondence from an individual seeking to file a complaint is directed—using the individual's language—to complete the online form.

Once a complaint is received, the Language Access Plan Coordinator, with support from the relevant department, investigates and responds promptly in the complainant's language. The response includes information about the complainant's right to escalate the issue to the Governor's Office of New Americans and provides their email: [GOV.NewAmericans@illinois.gov](mailto:GOV.NewAmericans@illinois.gov). The Language Access Plan Coordinator catalogs and tracks all complaints and related information through resolution.

## SECTION 8: MONITORING, EVALUATION, AND REPORTING PLAN

The Monitoring, Evaluation, and Reporting section of the Language Access Plan outlines the implementation and procedures IHDA 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 IHDA.

### Overview of Standard

In accordance with the Illinois Language Equity and Access Act, IHDA 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.

IHDA 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 Section 25(d)(3). The Authority 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.

The Language Access Plan Coordinator, together with the Authority's Legal department, will convene annually with all designated departments to exchange information and conduct a comprehensive review of the Language Access Plan.

### **Current IHDA Systems and Practices**

The Language Access Plan Coordinator and the Authority's Legal department gather annually with all identified departments to share information and review the Language Access Plan. This review assesses LAP progress, complaints, collected data, and requests for language assistance services, evaluates implementation, and ensures necessary updates are made. As part of this review, the Language Access Plan Coordinator may consider the following:

- Changes in the importance of programs the Authority oversees for LEP individuals and determine whether current assistance meets their needs.
- Changes in the resources and programs available to the Authority for serving LEP individuals, including new technologies, additional resources, and budget-dependent adjustments.
- Staff knowledge of the Authority's Language Access Plan.
- Changes in language abilities among Authority staff and assess the demand for additional language capabilities.
- Whether contracting other or additional third-party Language Assistance Services is necessary.
- Staff surveys on the frequency of Language Assistance Services usage and identify opportunities for improvement.
- Revisions to Vital Documents.

## SECTION 9: RESOURCES

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

## SECTION 10: APPENDIX: VITAL DOCUMENTS

(Translation in other languages is available upon request)

### **COMMUNICATIONS**

- **IHDA Website ([www.ihda.org](http://www.ihda.org))(multiple languages)**
  - Language Access Services Request Form (IHDA website) (multiple languages)
  - Language Access Complaint Form (IHDA website) (multiple languages)

### **COMMUNITY AFFAIRS**

- **Homeowner Assistance Fund Home Repair Program (English only)**

- Promissory Note
- Recapture Agreement
- Owner Agreement
- Income Calculator
- Frequently Asked Questions

- **Home Repair and Accessibility Program**

- Mortgage
- Note
- Special Notice About Your Forgivable Loan
- Owner Agreement
- Income Calculator
- Forgivable Loan FAQ
- Frequently Asked Questions (English and Spanish)

- **Habitat For Humanity Community Impact Fund (English only)**

- Mortgage
- Note
- Special Notice About Your Forgivable Loan
- Owner Agreement
- Income Calculator

### **HOMEOWNERSHIP**

- **Homeownership Website ([www.ihdamortgage.org](http://www.ihdamortgage.org))**
- **IHDAccess Forgivable Mortgage (4%) (English only unless noted otherwise)**
  - Borrower Affidavit
  - Fact Sheets

- 2nd Mortgage Note
- 2nd Mortgage
- IHDA Mortgage Rider
- US Bank Authorization
- Servicing Letter
- FHA Award Letter
- FHA Commitment Letter
- Recapture Notice
- Income Tax Affidavit
- Zero Income Certification
- Loan Release Cover Page
- Loan Release
- Loan Payoff Request Form
- Flyers (English and Spanish)

➤ **IHDA Access Deferred Mortgage (5%) (English only unless noted otherwise)**

- Borrower Affidavit
- Fact Sheets (Spanish and English)
- 2nd Mortgage Note
- 2nd Mortgage
- IHDA Mortgage Rider
- US Bank Authorization
- Servicing Letter
- FHA Award Letter
- FHA Commitment Letter
- Recapture Notice
- Income Tax Affidavit
- Zero Income Certification
- Loan Release Cover Page
- Loan Release
- Loan Payoff Request Form
- Flyers (English and Spanish)

➤ **IHDA Access Repayable Mortgage (10%) (English only unless noted otherwise)**

- Borrower Affidavit
- Fact Sheets (English and Spanish)
- 2nd Mortgage Note
- 2nd Mortgage
- IHDA Mortgage Rider
- US Bank Authorization
- Servicing Letter
- FHA Award Letter
- FHA Commitment Letter
- Recapture Notice
- Income Tax Affidavit
- Zero Income Certification
- Loan Release Cover Page
- Loan Release

- Loan Payoff Request Form
- Flyers (English and Spanish)

➤ **Other (English only)**

- Subordinations (TF/HHF Loans Only)
- Recission Letter

**LEGAL**

➤ **Freedom of Information Act Request Form (IHDA website) (multiple languages)**

**STRATEGIC PLANNING AND REPORTING**

➤ **Illinois Housing Search (multiple languages)**

- Website
- Illinois Housing Search Rack Cards

➤ **Consolidated Plan (English only)**

- Public hearing notices (English and Spanish)

➤ **Planning Services/Community Revitalization Survey (English and Spanish)**

➤ **Housing Blueprint (English only)**

- Statewide Resident Survey (English, Spanish, Polish and Chinese)
- Listening Tour Meetings (English and Spanish)

**STRATEGIC RESPONSE**

➤ **Program Documents (English and Spanish)**

- Court-Based Rental Assistance Program (CBRAP)
  - Application
  - Tenant Grant Agreement/Acknowledgment
  - Landlord Grant Agreement/Acknowledgment
  - Application Cure Template
  - Denial Letter
  - Approval Letter
- Cook County Foreclosure Mediation Program (CCFMP)
  - Hotline Call Script

➤ **Customer Relations (English and Spanish)**

- Call Script
- Email Script
  - Constant Contact Communications
  - Outlook Auto-Replies
- Phone Tree Prompts
  - Additional language available: Polish and Spanish
- Website [www.illinoishousinghelp.org](http://www.illinoishousinghelp.org) (English, Spanish, Arabic, Chinese, Hindi, Polish,

Portuguese, Tagalog, )

- Fraud Report Submissions  
<https://ilrpp.ihda.org/Application/ReportFraud>
- CBRAP (<https://www.illinoishousinghelp.org/cbrap>)
  - [County Income Limits Table](#)
  - [Tenant Direct Payments Informational Document](#) (page 36)
  - [Tenant FAQ's](#) (English, Spanish, Polish, Arabic, Chinese, Filipino, Hindi, and Portuguese)
  - [Landlord FAQ's](#) (English, Spanish, Polish, Arabic, Chinese, Filipino, Hindi, and Portuguese)
  - [Eviction Process FAQ's](#) ( English, Spanish, Polish, Arabic, Chinese, Filipino, Hindi, and Portuguese)
- CBRAP (<https://www.illinoishousinghelp.org/toolkit-rental>)
  - [Informational One-Pager](#) (English and Spanish)
  - [Tenant Acceptable Documents List](#) (English and Spanish)
  - [Landlord Acceptable Documents List](#) (English and Spanish)
  - [Eviction Help Flyer](#) (English and Spanish)
  - Fact Sheet (English and Spanish)
  - [Rental Ledger](#) (English and Spanish)
  - [Income Attestation](#) (English and Spanish)
  - [Tenant Guide](#)
  - [Housing Provider Guide](#)



**ILLINOIS HOUSING**  
DEVELOPMENT AUTHORITY

**Illinois Housing Development Authority**

# Language Access Plan:

## *Implementation Goals and Two-Year Action Plan*

State of Illinois

Office of New Americans



February 13, 2026

## TABLE OF CONTENTS

<b>Section 1: Needs Assessment</b>	<b>39</b>
<b>Section 2: Staffing and Coordination</b>	<b>43</b>
<b>Section 3: Language Assistance Services Plan</b>	<b>46</b>
<b>Section 4: Notification of Language Assistance Services Plan</b>	<b>52</b>
<b>Section 5: Language Access Training Plan</b>	<b>53</b>
<b>Section 6: Concern Resolution Process</b>	<b>55</b>
<b>Section 7: Data Collection, Monitoring and Updating Plan</b>	<b>56</b>
<b>Section 8: Evaluation and Reporting Plan</b>	<b>60</b>

## SECTION 1: NEEDS ASSESSMENT

### 1.1 FOUR-FACTOR ANALYSIS

---

#### FACTOR 1

##### **Implementation Goals**

IHDA will compile and analyze census data and information provided by ONA to identify and monitor the language needs of individuals with LEP within its service area. This work supports the first factor of the four-factor analysis, which considers the number or proportion of persons with LEP in the eligible service population served by the agency.

##### **Two-Year Action Plan**

#### Action Items

The Language Access Coordinator will review the demographic analysis and data shared by ONA.

---

IHDA will consult annually with the ONA and request relevant data from the State's Language Needs Assessment Report to supplement locally gathered data.

---

The Language Access Coordinator will update the Language Access Plan annually to reflect changes in the size, distribution, or language composition of persons with LEP to ensure the plan remains responsive to emerging needs.

---



---

#### FACTOR 2

##### **Implementation Goals**

To collect and analyze comprehensive data that supports improved monitoring of language needs, IHDA will:

- Identify and track aggregate data on the number of times language assistance services are requested or provided to individuals with LEP across IHDA's public facing programs and activities, as available through IHDA operations.

- Use web analytics tools, including Google Analytics, to track and report website traffic and user behavior metrics that may indicate engagement from individuals with LEP.

## Two-Year Action Plan

### Action Items

The Language Access Coordinator will collaborate with ONA to understand the requirements for compliance with the Illinois Language Equity and Access Act as it relates to the standard.

The Language Access Coordinator will identify the necessary and available data to track and analyze language needs.

Share aggregate data and information on interactions with individuals with LEP to IHDA with ONA and other Language Access Coordinators.

The Language Access Coordinator will collect and analyze data on language preferences and digital engagement with multilingual content.

The Language Access Coordinator will compile available data to track and analyze language needs and trends.

The Language Access Coordinator will administer changes to the Language Access Plan annually based on updated trends in language service use.

### FACTOR 3

#### IMPLEMENTATION GOALS

To assess the nature and importance of the programs, activities, or services provided by IHDA and ensure meaningful access to the General Public and Prospective Limited English Proficient Users, IHDA will:

- Ensure that vital documents affecting a person's access to, retention of, or exclusion from services, are translated into the languages most frequently encountered and other languages as needed. Online materials related to the direct services offered by IHDA will be translated by a certified vendor/contractor or multilingual staff in accordance with Section 3 of the Language Access Plan to ensure competent and timely access.

- Ensure interpretation services for all languages are available upon request, and that LEP Persons have access to interpretation services offered by specialized vendors or multilingual staff per Section 3 of the Language Access Plan.

## Two-Year Action Plan

### Action Items

The Language Access Coordinator will collaborate with ONA to understand the requirements for compliance with the Illinois Language Equity and Access Act as it relates to the standard.

The Language Access Coordinator will identify the specific services, programs, or activities that should be prioritized, based on the nature and importance of those services to the public.

The Language Access Coordinator will include the data compiled on language assistance services and submit the information to ONA every year for inclusion in the annual Language Equity and Access Compliance Report.

The Language Access Coordinator will administer changes to the Language Access Plan annually based on changes in the data collected.

## FACTOR 4

### Implementation Goals

IHDA will assess the resources available to support language access services. In alignment with best practice, IHDA will review and revise the budget allocation for language access annually. IHDA will coordinate with ONA and consider any technical assistance provided to support effective and responsive implementation of its Language Access Plan based on the needs of staff and individuals with LEP served, or likely to be served, by IHDA.

IHDA's annual line items should include:

- **Staffing:** to support adequate staffing, IHDA will appoint at least one Language Access Coordinators who oversee the implementation of language access responsibilities at the department or program level.
- **Language Access Services:** to cover the costs associated with providing language services to individuals with LEP, including interpretation services, translation

services, and other language assistance services. The services may be provided by multilingual staff or through contracts with qualified vendors.

- **Signage:** to cover the costs associated with the development and dissemination of multilingual signage and other visual notices that inform individuals of their right to language assistance services.
- **Training:** to cover the costs associated with IHDA’s employee development and training strategy, including providing language access training to state staff, including language access policy training, cultural awareness training, plain language training, and other relevant training.
- **Technology:** to cover the costs associated with procuring and maintaining technological solutions to facilitate language access services that are timely and effective, including over-the-phone interpreting, video remote interpreting, digital platforms, and online programs and services.

### Two-Year Action Plan

#### Action Items

The Language Access Coordinator will collaborate with ONA to understand the requirements for compliance with the Illinois Language Equity and Access Act.

IHDA will assess the resources available and allocate IHDA resources for language access, including language access services, signage, training, technology, outreach, and compliance monitoring and evaluation.

IHDA will consider the use of technology solutions to support the delivery of language assistance services, such as remote interpretation platforms or digital access tools.

IHDA and its Language Access Coordinator will review and adjust the budgets annually based on language access-related resources allocations regularly, including the needs of the department and individuals with LEP encountered by the department and its divisions, programs, and funded entities.

## SECTION 2: STAFFING AND COORDINATION

### LANGUAGE ACCESS COORDINATOR

#### Implementation Goals

IHDA will designate a Language Access Coordinator who is responsible for overseeing the development and implementation of the agency's language access plan. Additionally, the Act requires adequate staffing of multilingual employees and charges the Governor's Office of New Americans with setting staffing standards.

The Authority's Language Access Coordinators are:

Dr. Tiffany Davis  
Special Advisor on Equity and Inclusion  
Illinois Housing Development Authority  
111 E. Wacker Drive, Suite 1000  
Chicago, Illinois 60601  
languageaccess@ihda.org  
General: 312-836-5200  
IP Phone: 872-271-8048

Vanessa Hill  
Special Assistant to the Executive Department  
Illinois Housing Development Authority  
111 E. Wacker Drive, Suite 1000  
Chicago, Illinois 60601  
languageaccess@ihda.org  
General: 312-836-5200  
IP Phone: 872-271-8137

The specific responsibilities of the Language Access Coordinator(s) include:

- Reporting directly to IHDA leadership and collaborating with the Governor's Office of New Americans, which oversees statewide language equity efforts.
- Leading the development and submission of IHDA's Language Access Plan to the Governor's Office of New Americans, ensuring compliance with the Act.
- Coordinating and overseeing the implementation of the Language Access Plan to ensure IHDA fulfills its obligations to provide meaningful access for individuals with LEP as required by the Act.
- Participating in language access training, professional development, and skill-building opportunities provided or recommended by ONA in the Act's provision of technical assistance and oversight.

- Utilizing technical assistance, guidance, and resources provided by the ONA in the development, evaluation, and refinement of the agency’s Language Access Plan and services.
- Monitoring the accuracy, timeliness, and effectiveness of language assistance services provided by IHDA as required by the Act.
- Overseeing the development and implementation of processes to notify individuals with limited English proficiency of their rights to language assistance services, including multilingual signage and public notices.
- Facilitating and overseeing the ongoing employee development and training strategy to maintain well-trained multilingual employees and general staff regarding language access obligations.
- Overseeing the development and implementation of an internal complaint and review process specific to language assistance services, addressing and resolving complaints promptly, and escalating unresolved issues to the Governor’s Office of New Americans as necessary.
- Serving as the primary liaison to the Governor’s Office of New Americans and fulfilling all reporting responsibilities, including providing annual performance metrics, staffing data, service utilization statistics, and other required compliance data.

## Two-Year Action Plan

### Action Items

The Language Access Coordinator will collaborate with ONA to understand the requirements for compliance with the Illinois Language Equity and Access Act as it relates to the standard.

IHDA will ensure the Language Access Coordinator has appropriate agency-wide responsibilities to oversee the development and implementation of the Language Access Plan.

In consultation with ONA, IHDA will define the role of the a Language Access Coordinator that reflects the scope of responsibilities and duties outlined in the Language Equity and Access Act.

IHDA will designate a minimum of one Language Access Coordinator at any one time.

IHDA will designate adequate staff to fulfill its language access obligations.

## FUNDED ENTITIES

### Implementation Goals

To support the implementation of IHDA’s responsibilities under the Language Equity and Access Act, IHDA will incorporate language equity compliance provisions in State contracts with vendors, grantees and purchase of care entities. To support compliance, IHDA will:

- Incorporate language access in all contracts and agreements with funded entities, including an assurance of nondiscrimination.
  - Example Assurance of Non-Discrimination Language:
    - *[Contractor/Grantee/Recipient/Subcontractor/Subgrantee/Subrecipient] agrees to comply with Title VI of the Civil Rights Act of 1964, the Illinois Language Equity and Access Act, and all requirements imposed by the regulations issued pursuant to Title VI and the Act to the effect that, no person shall, on the grounds of race, color, or national origin (which includes Limited English Proficiency), be excluded from participation in, be denied the benefits of, or be otherwise subject to discrimination in any services performed pursuant to this contract.*

### Two-Year Action Plan

#### Action Items

The Language Access Coordinator will collaborate with ONA to understand the requirements for compliance with the Illinois Language Equity and Access Act as it relates to the standard.

IHDA will include an “Assurance of Nondiscrimination” clause as outlined in the Illinois Language Equity and Access Act into future contracts and agreements where required.

IHDA will undertake a comprehensive review of its funding relationships to identify those that fall within the scope of the Illinois Language Equity and Access Act.

## SECTION 3: LANGUAGE ASSISTANCE SERVICES PLAN

### 1. LANGUAGE NEED IDENTIFICATION

- **Implementation Goals**

IHDA will make available printed multilingual I-Speak resource cards at publicly accessible office locations as a language identification tool and to identify the spoken language(s) of persons with LEP. The I-Speak cards will be provided in, at minimum, the top languages spoken by individuals with LEP served by the agency, based on the Language Access Needs Assessment Report and other relevant data sources. This helps ensure that individuals with LEP in need of direct language assistance services can identify the language(s) they speak.

IHDA will annually review and update the list of languages listed on I-Speak cards and the languages available through digital translation features, including Google Translate, based on census data and available data collected on the number and percentage of individuals with LEP who engage with the Authority.

IHDA will also ensure that individuals with LEP accessing IHDA's digital content, including its website, will be notified of the availability of translated content via the Language Access section of the IHDA website. The Authority will implement design features that prompt users with LEP to select their preferred language. This can be accomplished by prominently displaying a "Select Language" button or tool. It is best practice for the "Select Language" button to translate the website and the drop-down list of languages to be large and easily visible. IHDA will evaluate the placement of the tool along with other website features and select the most visible place available.

## Two-Year Action Plan

### Action Items

The Language Access Coordinator will collaborate with ONA to understand the requirements for compliance with the Illinois Language Equity and Access Act as it relates to the standard.

The Language Access Coordinator will identify website content and locations that require multilingual prompts to inform users of the availability of translated content and how to request language assistance services.

The Language Access Coordinator will ensure the IHDA website is accessible in the languages prioritized, and that the link to translate is prominently displayed and made available in languages other than English.

---

The Language Access Coordinator will review and update the list of supported website translation languages using data on the number and percentage of persons with LEP who engage with the Authority.

---

The Language Access Coordinator will develop and maintain I-Speak cards for use at public-facing locations per the Illinois Language Equity and Access Act.

---



---

## 2. HIRING/CONTRACTING QUALIFIED INTERPRETERS FOR REAL-TIME COMMUNICATION

- **Implementation Goals**

IHDA will ensure that individuals with LEP have access to competent, timely, and effective real-time interpretation services when requested.

IHDA will retain qualified interpretation service providers. Any interpreter utilized through a state master contract meets the necessary qualifications. Staff who regularly interact with individuals with limited English proficiency will have access to the tools, resources, and technologies necessary to facilitate real-time interpretation.

Individuals with LEP who wish to use an interpreter other than one that is offered to them by IHDA may do so. However, they may be asked to sign an Interpretation Waiver Form to hold harmless the Authority.

IHDA will formalize the use of multilingual staff in interpretation roles as necessary. Certification and workload adjustments for these roles will be established in accordance with agency policy and applicable labor agreements.

### Two-Year Action Plan

#### Action Items

The Language Access Coordinator will collaborate with ONA to understand the requirements for compliance with the Illinois Language Equity and Access Act as it relates to the standard.

---

The Language Access Coordinator will ensure IHDA has a contract with a vetted and qualified interpretation services provider, selected based on the provider's demonstrated ability to deliver accurate, timely, and effective services. A contract pursuant to a state master contract is qualified.

---

---

The Language Access Coordinator will ensure that all necessary staff have access to qualified and trained in-person interpreters, through a vetted contractor/vendor.

---

The Language Access Coordinator will make available interpretation waiver forms to all staff who may interact with individuals with LEP. The Authority will review the feasibility of incorporating interpretation waiver forms into IHDA programs.

---

The Language Access Coordinator will provide ongoing training to staff on how to access in-person interpretation services, utilizing Interpretation Waiver Forms, and the role of appropriately engaging multilingual staff in interpretation roles.

---



---

### 3. EMPLOYING/ UTILIZING BILINGUAL OR MULTILINGUAL STAFF

- **Implementation Goals**

IHDA will employ bilingual and multilingual staff who speak English and languages other than English at proficient levels to communicate with persons with LEP, particularly in positions that require frequent interaction with individuals with LEP. IHDA will ensure staff members at reception and public call answering positions have access to qualified interpretation and translation services through vetted contractors or multilingual staff.

The roles and responsibilities of bilingual and multilingual staff will adhere to the Illinois Language Equity and Access Act and guidelines set forth by this Language Access Plan.

### Two-Year Action Plan

#### Action Items

The Language Access Coordinator will collaborate with ONA to understand the requirements for compliance with the Illinois Language Equity and Access Act as it relates to the standard.

---

Language Access Coordinator will assist the Human Resources department to fill positions that require bilingual or multilingual staff with multilingual staff, prioritizing those top languages spoken by individuals with LEP.

---

Language Access Coordinator will train bilingual/multilingual and monolingual staff on the roles, appropriate use, and limitations of multilingual staff when providing language assistance services

---

---

#### 4. TRANSLATION OF VITAL DOCUMENTS AND ONLINE CONTENT

- **Implementation Goals**

IHDA will translate vital documents and online content in accordance with state and federal compliance standards. IHDA will prioritize the translation of materials based on the language needs of individuals with LEP who engage with the Authority.

IHDA will translate all vital documents into the top five languages most widely spoken by LEP persons statewide or in the agency's service region. Translations will follow guidance outlined in the agency's Language Access Plan and any standards issued by ONA.

IHDA will apply the translation thresholds established in Section 25(d)(2) of the Act and guidance issued by ONA. For language groups that do not meet these thresholds, IHDA will provide written notice in the primary language of the LEP group regarding the availability of oral interpretation at no cost, consistent with Section 25(d)(2)(B) of the Act.

The top five languages to prioritize for translation include, but are not limited to Spanish, Chinese (Cantonese, Min, Yueh), Arabic, Polish, and Tagalog (Filipino), based on the most recent available data on the language needs of individuals with LEP. The top five languages to prioritize for translation will be reviewed and updated every year.

In accordance with the Language Equity and Access Act and informed by the Language Needs Assessment Report, the languages prioritized for translation will be determined using data on the number and percentage of LEP persons served or likely to be encountered by IHDA, including statewide and regional trends.

IHDA will identify and prioritize vital documents and online content for translation. Vital documents include public-facing written materials in any format, created, issued, or made available on any platform, including websites and digital resources, by IHDA to inform and communicate with the public, allow the public to apply for benefits, services, program participation, notify or correspond with an individual about their eligibility, participation, benefits, or outcomes of an application, advertise and inform the public about programs, services, resources, rules, requirements, public meetings, and events, provide instructions and guidance, provide the public a feedback submission process.

In collaboration with the Governor’s Office of New Americans, IHDA will support efforts to make online content accessible to individuals with limited English proficiency (LEP).

IHDA may use machine translation tools, such as Google Translate, to supplement access for individuals with LEP; however, vital documents posted online will be translated by qualified professionals.

As a best practice, IHDA is revamping its website so that language selection features are clearly visible, intuitive, and accessible. Where possible, the language selection button will be labeled in multiple languages and include the top five languages served by the agency.

Vital documents could include: [See Appendix]

IHDA will hire or contract qualified and trained translators via vetted contractors/vendors, such as those vetted and secured by the State of Illinois under a Master Contract, or utilize previously evaluated multilingual staff trained to perform translation services.

## Two-Year Action Plan

### Action Items

The Language Access Coordinator will collaborate with ONA to understand the requirements for compliance with the Illinois Language Equity and Access Act as it relates to the standard.

Language Access Coordinator will identify all vital documents used by IHDA to communicate essential information to the public; and compile a record of vital documents already translated, including the languages in which they are available.

Language Access Coordinator will identify vetted language service providers available to IHDA for professional translation services, or rely on those vetted and secured by the State of Illinois under a Master Contract, as well as assess the number and language capacity of bilingual or multilingual staff available to support translation.

The Language Access Coordinator will coordinate the translation of the following vital documents into the top five prioritized languages, using qualified translators or certified multilingual staff, and consistent with translation thresholds outlined in the Language Equity and Access Act.

- Signage in visible locations or on IHDA websites informing LEP persons of their language access rights and how to request language assistance;
- Website instructions on how to request additional information in non-English languages

The Language Access Coordinator will ensure the agency's website's language selection tools are prominently displayed and labeled in multiple languages as feasible within websites overall design.

The Language Access Coordinator will provide designated staff with access to approved machine translation tools or quick-response translation services from vetted vendors, for use in providing temporary or immediate translation support, while recognizing that vital documents must be professionally translated when threshold requirements are met.

The Language Access Coordinator will coordinate translation of prioritized documents using qualified vendors or trained bilingual/multilingual staff, following any standards or guidance developed by ONA, including the Statewide Language Access Policy and Translation Management protocols.

Language Access Coordinator will establish and maintain an ongoing process for the translation of newly identified or revised vital documents, to ensure continued meaningful access for individuals with LEP.

## SECTION 4: NOTIFICATION OF LANGUAGE ASSISTANCE SERVICES PLAN

### Implementation Goals

As outlined in the Illinois Language Equity and Access Act, IHDA will notify the public of the availability of free interpretation and translation services and provide information on how they can be requested.

IHDA will notify the general public and constituents with LEP of its commitment to language access and of available free interpretation and translation services through the following methods:

- Online multilingual communication of the development and content of the Language Access Plan.
- Multilingual communication online of free interpretation and translation assistance services available.
- Multilingual communication online of the processes to request language assistance services, including through the use of online forms.

- Multilingual notices will be clear, legible, and include guidance on how to request language assistance.

## Two-Year Action Plan

### Action Items

Language Access Coordinator will collaborate with ONA to understand the requirements for compliance with the Illinois Language Equity and Access Act as it relates to the standard.

Language Access Coordinator will identify all physical and online locations of public engagements (e.g. agency websites, service sites, public-facing platforms, and printed materials) that require the notification of language access services and a Language Access Plan.

Language Access Coordinator will develop multilingual materials and online content utilizing plain language standards.

Language Access Coordinator will prioritize the languages to translate notification materials and multilingual content into the top five prioritized languages in accordance with guidance set forth by ONA.

Language Access Coordinator will utilize vendors, contractors, or certified bilingual or multilingual staff to develop and translate multilingual content in accordance with the Translation Management Guidance (per quality assurance standards) should any be provided.

## SECTION 5: LANGUAGE ACCESS TRAINING PLAN

### Implementation Goals

IHDA will develop and implement an ongoing employee development and training strategy to be delivered to all personnel who interact with or may interact with individuals with LEP. Training components to be covered include:

- Overview of applicable federal, state, and local laws and agency policies related to language access including IHDA's internal language access procedures.
- Overview of Language Access Plan.
- Overview of language needs identification procedures.

- Overview of language assistance services, including how to locate, contract, and deliver services through approved vendors or contractors.
- Overview of the role of the interpreter and guidance on how to work effectively with interpreters.
- Overview of the roles and responsibilities of bilingual or multilingual staff and when and how to contact them.
- Review of accessing language access tools and resources developed by the Language Access Coordinator(s) and other language access staff.
- Review of internal complaint and review process for addressing complaints promptly, and the process to elevate complaints to ONA.

IHDA will monitor and evaluate its language access training on an ongoing basis to determine if additional or updated training components are necessary based on LEP individuals' interaction with the Authority.

- Provide refresher training to all existing staff who interact with or may interact with individuals with LEP.
- Ensure that all newly hired staff receive training on language access rights, agency protocols, and procedures for delivering language assistance services during onboarding,
- Provide cultural and linguistic competency training periodically,
- Maintain and regularly review training participation records to ensure compliance for all staff and those who may come into contact with individuals with LEP,
- Report progress on the performance assessment to ONA annually to support compliance reporting.

## Two-Year Action Plan

### Action Items

Language Access Coordinator will collaborate with ONA to understand the requirements for compliance with the Illinois Language Equity and Access Act as it relates to the standard.

Language Access Coordinator, in collaboration with the ONA, will organize and develop training materials to coordinate language access implementation. The Language Access Coordinator should prioritize the following:

- Data Collection tool for tracking encounters with individuals with LEP,
- Guidance for identifying vital documents,
- Guidance for translation, and
- Concern forms for reporting quality issues.

Language Access Coordinator, in collaboration with ONA, will develop comprehensive training modules for staff to be calibrated to their role in the Authority.

---

The Language Access Coordinator will conduct training for all staff on all training components who may engage with LEP individuals.

---

The Language Access Coordinator will conduct additional training for specialized staff.

---

Language Access Coordinator will report on the progress of their language access training to the Statewide Director of the Language Access Program as required.

---

## SECTION 6: CONCERN RESOLUTION PROCESS

### Implementation Goals

IHDA will develop and make publicly available multilingual complaint form and clear procedures for submitting complaints regarding noncompliance with the agency's Language Access Plan, difficulties in accessing language assistance services, and concerns related to the accuracy or quality of interpretation or translation services.

IHDA will make language access complaint process publicly available, including instructions for submitting complaints electronically. IHDA, in collaboration with the Governor's Office of New Americans (ONA), will establish a dedicated email address to receive complaints from individuals with limited English proficiency (LEP). This inbox will be monitored by the agency's Language Access Coordinator(s).

IHDA will ensure that the complaint form, submission instructions, and complaint process description can be translated into the language spoken by individuals with LEP who seek to file a complaint.

IHDA will prominently display the multilingual complaint process and forms on the language access page of its public website.

IHDA shall timely and equitably address language access complaints submitted by individuals with LEP, members of the general public, or other stakeholders.

Language Access Coordinator(s) shall track, address, and report all language access concerns submitted to IHDA and be responsible for:

- Taking proactive steps to address concerns associated with language access and respond to concerns within 15 business days.
- Track all received concerns and report the concerns and updates on their resolution to the Coordinating Entity and relevant members of IHDA’s leadership team.

**Two-Year Action Plan**

**Action Items**

In collaboration with ONA, Language Access Coordinator will develop a concern resolution process form that is culturally appropriate and follows plain language standards.

Language Access Coordinator will make available the concern resolution process form into the language spoken by individuals with LEP submitting a concern.

In collaboration with the Office of the Governor, IHDA will establish a dedicated multilingual communication channel, such as an email address, through which individuals with LEP can submit language access complaints or concerns.

Language Access Coordinator will make available the complaint form and contact information on IHDA’s public-facing website.

Language Access Coordinator will log, monitor, address, and report complaints and concerns related to language access concerns.

**SECTION 7: DATA COLLECTION, MONITORING AND UPDATING PLAN**

**Implementation Goals**

Each public facing department will collect data regarding its provision of Language Assistance Services to LEP individuals. Such data will depend on the nature of the department and infrastructure constraints as detailed below. This data will be compiled by the Language Access Plan Coordinator for reporting purposes and to develop necessary revisions to this LAP.

The Authority will monitor the total number of incoming calls across all public-facing phone lines, including main reception, the rental assistance phone line, and Homeownership phone line. The Authority will also track the number of incoming calls initiated by a LEP individual and the specific language requested. Additionally, the Authority will track the number of times it has utilized Propio or Multilingual Connections, noting the purpose—whether Interpretation or Translation—and the language requested.

The Authority will track the total number of visitors to the three websites it maintains or co-maintains as well as the number of visitors who choose to view the site in each available language, and will track data from [www.illinoishousingsearch.org](http://www.illinoishousingsearch.org) as that information is made available to the Authority.

The Human Resources department is tasked with assessing and maintaining records of all Authority staff who provide multilingual services to the public and specifying the languages in which they are proficient. This information will be tracked and shared regularly with the Language Access Plan Coordinator to ensure effective coordination and support for language accessibility. The Language Access Plan Coordinator will track the number of language access request form submissions and language access complaint form submissions as well as resolutions.

### **Implementation Goals by Department**

Of the various departments that comprise the Authority, the following interact with individuals in the public including LEP individuals:

#### **i. Community Affairs**

The Community Affairs department has little direct engagement with LEP individuals and depends on its external partners to comply with LEP requirements. The Community Affairs department oversees a portfolio of programs directed towards promoting and creating fiscally stable households and communities. This department coordinates with external partners, including units of local government, HUD-certified housing counseling agencies, community-based organizations, community action agencies, and regional planning commissions, and works with staff across Authority departments to identify and provide input for the design of program initiatives.

Federal requirements for housing counseling agencies demand they have a plan for serving LEP individuals and to have counselors on staff that can speak the language of the population they serve. Going forward, housing counseling programs will provide the total number of LEP individuals served during a specific time period. The client management systems required to be utilized to be a HUD certified counseling agency do not allow for the tracking of language specificity data at this time. Other public-facing programs run by this department's external partners, including home repair programs, will provide a total number of LEP individuals served and the specific language requested.

## **ii. Homeownership**

The Homeownership department is responsible for all production and servicing activities offered by the Authority related to single-family homeownership including, but not limited to, down payment assistance, closing cost assistance, and mortgage financing loans to single-family residential homebuyers across the State. Homeownership also provides training and technical assistance to lenders, servicers, Realtors, non-profits, borrowers, and municipal staff that participate in the Authority's programs or share these programs with their clients or constituents. Homeownership works through the Authority's lender network and neither originates any first position purchase-money loans nor assists potential borrowers through the loan approval process.

Nevertheless, the Homeownership department operates a dedicated department phone line and has Spanish-speaking staff to explain Authority programs to LEP individuals whose Primary Language is Spanish. It also ensures that partner lenders who serve a significant Spanish-speaking population have bilingual employees to explain the various Authority loan products to Spanish-speaking LEP households. The Homeownership department also has access to Propio.

Moving forward, this department will monitor the number of individuals utilizing Authority lending products. The existing loan management system, Encompass, allows for the following options only: English, Chinese, Korean, Spanish, Tagalog, Vietnamese, Other, or No selection. Additionally, calls to the Homeownership department phone line will be tracked, including those requiring communication in languages other than English, with the specific language noted.

## **iii. Strategic Planning and Reporting**

The Strategic Planning and Reporting department provides overall coordination and staffing for the development of the State's annual federal and State required housing plans and performance and progress reports. The Strategic Planning and Reporting department also represents the Authority on several public advisory groups.

This department co-maintains with other State agencies the State of Illinois Housing Search website [ilhousingsearch.org](http://ilhousingsearch.org). This statewide housing locator database is available in multiple languages through the Google translate plug-in Tool. A multilingual call center with Spanish and Polish speaking staff is available. As part of the federal Housing and Urban Development Consolidated Plan, this department, as coordinator, is required to offer both bilingual services and Interpretation services for the visually and hearing-impaired at

its annual public hearings. This department is also responsible for developing and distributing the brochure “rack” cards advertising the site, available in both English and Spanish.

The Strategic Planning and Reporting department does not have access to LEP data from [ilhousingsearch.org](http://ilhousingsearch.org) and it is unknown at this time whether it will gain access. Going forward, the department will track the number of public advisory group meetings it is responsible for conducting where non-English speaking accommodations are sought, and the specific language requested. As the department continues to assess and address LEP needs, the department may implement additional Language Assistance Services.

#### **iv. Strategic Response**

The Strategic Response unit serves as the Authority's sole department that primarily engages directly with the public. This department currently administers the Illinois Court Based Rental Assistance Program. Applications for this program are available in English and Spanish. Assistance in other languages is available upon request. Program information is available in Spanish, Polish, Tagalog, Arabic, Chinese, Hindi, and Portuguese at [illinoishousinghelp.org](http://illinoishousinghelp.org).

This department supports the rental assistance phone line, which provides information on the Authority's services, programs, and activities and connects the public to additional statewide resources. It also provides supplementary support for the Authority's main reception phone line. These phone lines are supported by a mix of Authority and contract staff who speak Spanish and Polish and have access to Propio.

Applicants or potential applicants to programs run by this department can request Language Assistance Services over the phone, by emailing the program directly, or through the language assistance request form on the [ihda.org](http://ihda.org) website. Applicants and potential applicants also can schedule one-on-one phone calls with Strategic Response staff who can assist with program applications, at which point Language Assistance Services are provided as necessary either from Multilingual Staff or through Propio.

Going forward, this department will track the total number of applications in Spanish and English, the total number of calls to the rental assistance phone line, the number of which requiring language assistance, and the number of requests for other language assistance received directly by this department. This department will also track the number of requests for language services received directly by the department and the language

requested. As the department continues to assess and address LEP needs, the department may implement additional Language Assistance Services.

### Two-Year Action Plan

#### Action Items

In collaboration with the ONA, Language Access Coordinator will develop data collection methods and a reporting tool to report on the progress of implementing the Language Access Plan.

Language Access Coordinator will collect departmental data from each public-facing department as described within this Language Access Plan.

Language Access Coordinator will track all incoming calls across public facing phone lines, noting calls from LEP individuals and the specific languages requested.

Language Access Coordinator will record the number of times Propio or Multilingual Connections are used, specifying whether for interpretation or translation and the language involved.

Language Access Coordinator will track total visitors to IHDA maintained websites and record the number of visitors who access content in each available language.

Human Resources will maintain records of staff providing multilingual services, including language proficiency, and share this data regularly with the Language Access Plan Coordinator.

The Language Access Plan Coordinator will track submissions of language access request forms and complaint forms, along with resolutions.

The Language Access Plan Coordinator, Legal department, and relevant departments will meet annually to review collected data, evaluate implementation, assess staff knowledge, and determine necessary updates to the Language Access Plan.

## SECTION 8: EVALUATION AND REPORTING PLAN

### Implementation Goals

The Language Access Plan Coordinator and the Authority's Legal department will gather with all identified departments to share information and review this Language Access Plan annually. This review will assess LAP progress, complaints, collected data, and requests for

language assistance services, evaluate its implementation, and ensure necessary updates are made. To do this, the Language Access Plan Coordinator will review the data and may make use of any of the following:

- Assess any changes in the importance of programs which the Authority oversees for LEP individuals and determine whether this assistance meets the needs of LEP individuals.
- Consider any changes in the resources and programs available to the Authority in providing services to LEP individuals, including new technologies, additional resources, and changes (subject to budget availability).
- Evaluate staff knowledge of the Authority's Language Access Plan.
- Evaluate possible changes in language abilities available among Authority staff, and the demand to add additional language abilities among Authority staff.
- Assess whether there is a need to contract other or additional third-party Language Assistance Services.
- Survey staff on how often Language Assistance Services are used and how they could be improved.
- Consider revisions to Vital Documents.

IHDA will develop a will develop and submit an annual performance assessment to ONA:

- A summary of IHDA's progress on the implementation of the goals, performance measures, and action steps outlined in its Language Access Plan.
- An analysis of any changes or trends in the languages spoken by individuals with LEP.
- The number and language spoken by individuals with LEP served by IHDA within the reporting period, as described within this Language Access Plan.
- An assessment of identified gaps in IHDA's capacity to implement its Language Access Plan or to ensure meaningful access for individuals with LEP.
- An evaluation of the number and deployment of multilingual employees in public contact positions, as determined by the frequency and importance of language access needs to ensure meaningful access.
- Aggregate data on multilingual employees, including the number and language(s) spoken of staff serving in public contact roles, as well as those serving in a limited contact or advisory capacity.
- Progress on the implementation of staff development and language access training efforts.
- Progress in meeting the following translation implementation goals:
  - Translation of general descriptions of IHDA's mission, functions, and available services/programs;
  - Displaying multilingual signage notifying LEP persons of the right to free interpretation services and how to request them;

- Documentation of completed translations of vital documents, websites, and digital content, prioritized based on the frequency and importance of services/programs;
- Identification of the languages into which vital documents have been translated to date;
- A list of planned translations for vital documents, websites, and other digital resources for the upcoming Language Access Plan period and/or fiscal year, and the associated target languages.

IHDA will annually review and revise its budget for language assistance services in accordance with internal approval protocols and with technical assistance from ONA. This process will ensure that budget allocations remain adequate, effective, and responsive to the needs of agency staff and individuals with LEP served or likely to be served by IHDA.

To support the evaluation of the effectiveness of the Language Access Plan and the provision of language assistance services, IHDA will conduct the following annual performance assessments:

- Staff surveys to assess knowledge and understanding of the Language Access Plan, including protocols for requesting and providing services.
- Ongoing review and analysis of complaints and concerns received regarding language access services, conducted annually or on another consistent schedule.

To ensure that language assistance services continue to meet the needs of individuals with LEP, IHDA will track, analyze, and report on the frequency and type of encounters with LEP annually as described within this Language Access Plan. The ongoing process of tracking and analyzing demand will include:

- Annual analysis of the demand for interpretation and translation services, including identification of program areas with high volumes of encounters with LEP.
- Assessment of the most frequently requested languages and the types of language assistance services needed (e.g., interpretation, translation, multilingual staff assistance).

IHDA will monitor statewide demographic trends, including information from the Language Needs Assessment Report new or emerging languages and/or to assist with identifying the need for additional language services to be delivered in high-demand languages.

## Two-Year Action Plan

### Action Items

In collaboration with the ONA, Language Access Coordinator will develop data collection methods and a reporting tool to report on the progress of implementing the Language Access Plan as described in this Language Access Plan.

---

Language Access Coordinator will implement these data collection methods and the reporting mechanism to track implementation activities, identify gaps, and assess compliance with the Illinois Language Equity and Access Act.

---

Language Access Coordinator will monitor and evaluate the quality, timeliness, and effectiveness of language assistance services provided by IHDA.

---

Language Access Coordinator will review data collected on internal complaints or concerns related to language assistance services and their resolution.

---

Language Access Coordinator will implement data collection methods as described within the Language Access Plan and a reporting process to prepare and submit updates to ONA.

---

Language Access Coordinator will continue to monitor collected data and report on emerging language needs, service utilization trends, and barriers to meaningful access to ensure continuous improvement of language access efforts.

---