

# Illinois Board of Higher Education Language Access Plan

Issued June 2021 | Revised Nov 2025

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## Introduction and Overview

The Illinois Board of Higher Education (“IBHE” or “Agency”) has prepared this Language Access Plan (“LAP” or “Plan”) for the purposes of outlining the protocol and procedures taken by IBHE to ensure meaningful and universal access to any IBHE Program, Service, and Activity on the part of persons who self-identify as Limited English Proficient (“LEP”) or have a preference for materials and services in a language other than English.

IBHE recognizes an LEP person whose primary language for communication is not English and who has a limited ability to read, write, speak, or understand English.<sup>1</sup> An LEP person maintains the right to self-identify, as well as the right to indicate their language of preference, particularly as it relates to information technology delivery.

According to U.S. Census data from 2014-2018, 23% of Illinois residents were estimated to speak a language other than English at home (population of aged five years and older). The data also showed that Spanish (13.6%) is the predominant non-English language spoken at home in Illinois.

## Function of IBHE

IBHE has been supporting higher education in Illinois for more than 50 years, comprised of dedicated team of professionals, overseen by a Board appointed by the Governor, who are working for a strong, equitable higher education system, which is essential for the state to thrive. IBHE works with leaders in colleges, universities, state and federal government agencies, governors, legislators, and other entities to strategically further this mission. Due to the nature of the programs, activities, services provided by IBHE, these services have not been historically accessed by persons with LEP.

In its strategic plan, *A Thriving Illinois: Higher Education Paths to Equity, Sustainability, and Growth*, IBHE has identified three goals and 25 strategies to help achieve its vision of a higher education ecosystem that ensures individuals, families, and communities across the state thrive.

1. Equity
  - Close equity gaps for students who have been left behind
2. Sustainability
  - Build a stronger financial future for individuals and institutions
3. Growth
  - Increase talent and innovation that drives economic growth

## Policy Statement

It is the policy of IBHE to provide meaningful access for LEP persons to any IBHE Program, Service, and Activity for which they may individually be eligible to participate. This Language Access Plan also seeks to align IBHE's efforts and ensure compliance with Illinois's Language Equity and Access Act

IBHE shall provide access to free Language Assistance Services to LEP persons whenever an LEP person requests Language Assistance Services. Upon request, the Agency will inform members of the public that Language Assistance Services are available free of charge to LEP persons and that IBHE will provide and make available these services to them.

## Purpose

This Language Access Plan aims to provide guidance to IBHE 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 IBHE 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.

IBHE will take reasonable steps to ensure that every Illinoisan has the opportunity to communicate with and access state websites, documents, information, and services. State and federal law create a legal obligation to provide such access and potential liability where the state fails to do to.

This plan is consistent with the federal and state requirements as detailed below.

Nationwide protections include:

- Title VI of the Civil Rights Act of 1964 and its implementing regulations, which prohibit discrimination on the basis of race, color, and national origin, including language proficiency.

And, in Illinois protections and policies include:

- The Illinois Civil Rights Act of 2003, which is modeled after Title VI, prohibits units of State, county, and local government from utilizing criteria or methods of administration that have a disparate impact on the basis of race or national origin, regardless of intent.
- The Illinois Human Rights Act, which prohibits discrimination on the basis of several protected characteristics, including race and national origin.
- The Language Equity and Access Act, which ensures that all Illinois residents, including those who have limited English proficiency, have meaningful access to State government services through enhanced language access plan development across state agencies, boards and commissions under the Governor's Office.

IBHE will operationalize this by:

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

- Conducting a regular assessment that describes the population of persons with LEP the agency serves, the policy and programmatic actions implemented to ensure meaningful access, and the metrics used to measure compliance with the Language Equity and Access Act.
- Strengthening IBHE's capacity to develop and distribute multilingual content and expanding access to translated vital documents and other resources. Translation of vital records will be prioritized with guidance provided by ONA. The agency will also work to expand multilingual website content, including program information, complaint procedures, and eligibility criteria.
- Establishing mechanisms to track progress across divisions, programs, and funded partners, and supporting efforts to meet language access compliance standards. This includes collecting and reporting data on how to use interpretation and translation vendor services, including volume, language type, and service type. IBHE will maintain a complaint and review process and ensure timely resolution.
- Provide ongoing employee development and training to maintain well-trained bilingual employees and general staff. IBHE will also collect and report data on bilingual staff roles, language certifications, and language capacity across its workforce.
- Ensuring the Language Access Plan and related materials are publicly available through the IBHE website and other accessible formats.

This policy also provides for communication of information contained in vital documents. For this purpose a document is "vital" if it "contains information that is critical for obtaining [federal] services and/or benefits, or is required by law." IBHE will determine which materials, including websites, need to be translated. In addition, IBHE will regularly reassess materials to identify vital documents.

All interpreters, translators and other aids needed to comply with this policy shall be provided without cost to the person being served, and the person will be informed of the availability of such assistance free of charge. Language assistance will be provided through use of competent bilingual staff, staff interpreters, contracts or formal arrangements with local organizations providing interpretation or translation services, or technology and telephonic interpretation services. All staff will be provided notice of this policy and procedure, and staff that may have direct contact with an individual with limited English proficiency will be trained in effective communication techniques, including the effective use of an interpreter.

IBHE will conduct a regular review of the language access needs of our population, as well as update and monitor the implementation of this policy and these procedures, as necessary.

## Goals

To achieve the goal of meaningful access to any IBHE Program, Service, and Activity by LEP persons, IBHE will:

1. Perform a needs and capacity assessment
2. arrange for oral language assistance, as appropriate
3. translate Vital Documents in languages other than English (as requested)
4. update LAP policies and procedures
5. monitor access to language assistance
6. provide staff training on the language service provision

## Determining Language Needs

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

- In Illinois, 1.0 million residents speak English less than "very well," and speak a language other than English at home. Both federal and state policies recognize that these individuals have a right to equitable access to government services, which includes information and communication in a language they understand.
  - Eleven languages have more than 10,000 limited-English speakers in Illinois, including:

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

- The predominant language other than English in many Illinois counties may be Spanish, but closer examination of the most common non-English languages shows that immigrants and migrants come to Illinois from many places. For example, in Champaign County, the top language spoken in limited English households is Mandarin, and in Macon County, it is Tagalog. Additionally, in Cass and Knox counties, the second language is French/Haitian/Cajun. In Madison County, it's Tagalog. In Cook, DuPage, and Kane counties, the second language category is Slavic. In Boone County, "other Asian Pacific Islander" is second to Spanish.
- A statewide map of persons who don't speak English very well shows that the largest numbers of such persons are in the metro Chicago area. Nevertheless, significant numbers of up to 9 thousand are located in townships across the state and are often located near metro areas such as St. Louis, Springfield, Champaign, and Rock Island. There are also notable populations in relatively rural townships in counties such as Cass, Douglas, or Union.
- After years of decline, the number of Illinois residents who don't speak English very well is on the rise. In examining ten years, from 2014 to 2023, this population fell by 79,000 persons between 2014 and 2019. But since a low of 1.0 million in 2019, the most recent data, for the year 2023, shows about 1,082,000 persons, for a gain of some 82,000.

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

Currently IBHE does not have historical data on interactions with LEP due to limited or no interactions with the agency.

In order to ensure that all encounters with individuals with Limited English Proficiency (LEP) across programs and services are collected in a comprehensive and ongoing manner, IBHE will:

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

## Identifying LEP Individuals

There are a number of ways to determine if an individual is Limited English Proficient:

1. LEP person self-identifies as LEP; and/or
2. LEP person requests an interpreter; and/or
3. During the first point of contact, IBHE staff believes that the individual does not speak and understand English well enough to effectively participate in the conversation or fully understand questions and answers them with difficulty

IBHE reception staff, at the point of first contact with a LEP-possible person, shall make an initial assessment of the need for language access services by taking the following steps:

1. The staff member shall ask professional, open-ended questions of the LEP-possible person to determine the individual's ability to speak or understand English.
2. If the staff member determines that the LEP-possible person is proficient in understanding and speaking English, he or she shall ask the LEP-possible person whether he or she needs assistance in reading or writing English.
3. If the LEP-possible person makes an oral or written request for translation or interpretation services in a specific language, the person should be considered as LEP.
4. Once it is determined that the individual is LEP. The staff member shall assess the type and nature of the language(s) in which the individual is proficient, and whether the person requires translations services, interpretation services, or both.
5. Although use of informal interpreters—such as family members or the internet—should be avoided, staff members may utilize such for the purpose of assessing an individual's LEP status.
6. The staff member should proceed with documenting and individuals LEP status and whether language access services were needed, more specifically the type of services rendered. The information should include the LEP person's name, the person's language of choice, and the specific language assistance needed/utilized.

## Providing Language Access

IBHE is committed to a higher education ecosystem that reinforces equity, sustainability, and growth.

The IBHE website is: [www.IBHE.org](http://www.IBHE.org)

The IBHE Language Access Coordinator is: Rachel Bolinger, HR Director Phone: (217) 782-2551

The IBHE Language Access Plan is overseen by the Human Resources Department and will be implemented throughout the Agency to provide Meaningful Access to persons limited in their English language proficiency. The IBHE HR Director serves as the Language Access Coordinator (LAC) for the Agency, tasked with:

- creating, advising, and overseeing policy directives, data collection
- developing and modifying the language access plan
- monitoring the agency's approach to providing services to LEP individuals
- monitoring the plan's performance
- overseeing the process for reviewing, and, if appropriate, modifying current language access plans, policies, and procedures
- updating the plan data and content every fiscal year, if applicable
- Supporting ongoing compliance by partnering with ONA to ensure coordinated implementation and compliance with language access requirements

Effective Communication with LEP persons requires IBHE to have Language Assistance Services in place. There are two primary types of Language Assistance Services: oral and written. Oral Language Assistance Services may come in the form of "in-language" communication (a demonstrably qualified Bilingual Staff member communicates directly in an LEP person's language) or Interpretation. Translation is the replacement of written text from one language into another. A translator also must be qualified and trained.

## Oral Language Assistance

The LAC is tasked with:

1. Maintaining an accurate and current list showing the name, language, phone number and hours of availability of bilingual staff;
2. Contacting the appropriate bilingual staff member to interpret, pending availability of the employee who speaks the needed language;
3. Obtaining an outside interpreter if a bilingual staff or staff interpreter is not available or does not speak the needed language. Central Management Services (CMS) provides statewide master contracts for use by all agencies. The statewide master contract for language translation and interpretation is currently under contract with Multilingual Connections, LLC (MLC) until May 13th, 2026. Agencies can leverage the contract with MLC to provide any number of translation or interpretation projects;
  - a. Some may prefer or request to use a family member or friend as an interpreter. However, family members or friends will not be used as interpreters unless specifically requested by that individual and after an offer of an interpreter at no charge to the person has been made by the staff. Such an offer and the response will be documented via email or other file document for future reference;
  - b. If the person chooses to use a family member or friend as an interpreter, issues of competency of interpretation, confidentiality, privacy, and conflict of interest will be considered. If the family member or friend is not competent or appropriate for any of these reasons, staff will offer other interpreter services will be provided.
  - c. If interpretation services are needed, the Department shall take the following steps:
  - d. A staff member shall contact the telephonic or internet language interpretation service provider with whom IBHE has contracted for this purpose. The statewide master contract for language translation and interpretation is currently under contract with Multilingual Connections, LLC (MLC)

until May 13th, 2026. Agencies can leverage the contract with MLC to provide any number of translation or interpretation projects

## Document and Website Translation

IBHE shall identify and translate Vital Documents to provide Meaningful Access to LEP persons.

For translation requests of specific documents, please email [humanresources@ibhe.org](mailto:humanresources@ibhe.org). Please be advised that document translation requests may take two to four weeks. Please view the current list of Vital Documents.

If needed and requested, IBHE will provide machine translation services for its website via AI or Google Translate.

## Vital Documents

A document will be considered vital if it contains information that is critical for obtaining the federal services and/or benefits, or is required by law.

- Vital documents must be translated when a significant number or percentage of the population eligible to be served, or likely to be directly affected by the program/activity, needs services or information in a language other than English to communicate effectively. For many larger documents, translation of vital information contained within the document will suffice and the documents need not be translated in their entirety
- The IBHE website is available to the public and can be translated into 200+ languages using Google Translate, including the top languages needed by LEP individuals:
  1. Spanish
  2. Polish
  3. Chinese
  4. Tagalog
  5. Arabic
  6. Urdu
  7. Korean
  8. Vietnamese
  9. Gujarati
  10. Russian
  11. Ukranian
- Agencies should proactively translate vital written documents into the frequently encountered languages of LEP groups eligible to be served or likely to be affected by the benefit program or service.
  - Currently IBHE has not translated any vital documents due to its limited/no historical interaction with LEP individuals.

IBHE has identified the following as “vital documents”:

- How to obtain transcripts [PBVS Transcript Request Form 2.1 112524.pdf](#)
- Private Business And Vocational Schools (PBVS) Act [105 ILCS 426 Private Business and Vocational Schools Act of 2012](#)
- PBVS Administrative Rules [PBVSAdminRules.pdf](#)
- PBVS Applications System & Database [IBHE Applications\(Powered by ePV\)](#)
- Administrative Rules (23 Ill. Admin. Code 1050) (pdf) - Public
- Administrative Rules (23 Ill. Admin. Code 1030) (pdf) - Private
- Administrative Rules (23 Ill. Admin. Code 1009) - Dual Credit -



- Administrative Rules (23 Ill. Admin. Code 1033) - SARA Distance Learning
- Illinois Administrative Rules 1030 provides for institutional orientation for institutions applying for authorization to operate
  - Orientation materials and registration form
  - Application materials
  - Institutional filing forms
- Online complaint form
- Degree Granting Transcript Request Form
- IBHE FY24 Annual Report

## Training

IBHE is committed to providing ongoing employment development and training on language access to maintain well-trained bilingual employees, general staff, and all staff who interact with or may interact with individuals with LEP receive ongoing professional development and training on language access policies, procedures, and responsibilities. As part of new hire training and annually thereafter, IBHE will train applicable staff on the policies and procedures of its LAP including how to determine whether Language Assistance Services are needed. In addition, staff will receive training on how to secure Language Assistance Services for a member of the public or student, and on how to work with interpreters and translators via the developed standard operating procedures.

## Complaint Process

Persons not satisfied with the services provided, as available in this plan, can make an official complaint by following the steps outlined below:

- 1) Submit a formal complaint by mail to IL Board of Higher Education, 1 N Old State Capitol Plaza Suite 333, Springfield, IL 62701 or by email to [HumanResources@ibhe.org](mailto:HumanResources@ibhe.org)
- Complaints must include the following:
  - Complaint name
  - Reason for Complaint including which part of the IBHE LAP was violated
- 2) Upon receipt, the IBHE EEO/AA Officer (Director of Human Resources) will issue a formal response within 30 calendar days.
- 3) If the complainant is still not satisfied with the response, the complainant may escalate to the IBHE General Counsel by mail to IL Board of Higher Education, 1 N Old State Capitol Plaza Suite 333, Springfield, IL 62701 or by email to [info@ibhe.org](mailto:info@ibhe.org)
- 4) Upon receipt, the IBHE General Counsel will issue a formal response within 30 calendar days.
- 5) If the complainant is still unresolved, complainants may appeal directly via email to [GOV.NewAmericans@illinois.gov](mailto:GOV.NewAmericans@illinois.gov)

## Monitor Access to Language Assistance

To the extent possible, IBHE will assess changes in demographics, types of services or other needs that may require reevaluation of this plan and its procedures and make changes as necessary. In addition, IBHE will regularly assess these procedures, including but not limited to mechanisms for securing interpreter services, equipment used for the delivery of language assistance, complaints filed by persons with limited English proficiency, and feedback from individuals, community organizations, etc. gathering data to assess the effectiveness of component language assistance services. This may include:

- Conducting an inventory of languages most frequently encountered
- Identifying the primary channels of contact with LEP community members (whether telephonic, in person, correspondence, web-based, etc.)



- Identifying the extent to which language assistance services were requested, needed and/or accessed by individuals with LEP
- Reviewing plans and protocols
- Reviewing the annual cost of translation and interpreter services, and
- Consulting with outside stakeholders, including any updates ONA may provide