

# THE BILINGUAL NEEDS AND BILINGUAL PAY SURVEY REPORT FOR FISCAL YEAR

July 1, 2016 – June 30, 2017



In accordance with Personnel Code, the Director of the Department of Central Management Services submits this report to the members of the Illinois General Assembly

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# Michael M. Hoffman Acting DIRECTOR



# DEPARTMENT OF CENTRAL MANAGEMENT SERVICES

Michael M. Hoffman, Acting Director

#### **BILINGUAL NEEDS AND BILINGUAL PAY REPORT 2017**

ILLINOIS

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### THE BILINGUAL NEEDS AND BILINGUAL PAY REPORT FOR FISCAL YEAR JULY 1, 2016 – JULY 30, 2017

#### I. EXECUTIVE SUMMARY

#### A. State of the State: Bilingual Needs and Services

Illinois Governor Bruce Rauner advocates that public service is a public trust and instructs his administration to operate as a team of public servants working for our fellow citizens.<sup>1</sup> It is our goal to ensure that all Illinois residents can fully participate in civic life and can fully access the services provided by the State of Illinois that are vital for the health, welfare, safety, and quality of life for all Illinois residents.

The Illinois legislature has passed several laws to increase the number of appropriately skilled bilingual State employees and recently created a Language Access to Government Services Task Force to study and reduce language barriers in order to maximize the ability of Illinois residents with limited English proficiency to access government services, rights, and privileges.

#### 1. Illinois' Need

Illinois enjoys a rich diversity and is home to the fifth largest concentration of individuals with limited English proficiency in the United States. More than one million Illinois residents, nearly 10% of the population, do not communicate effectively in English.<sup>2</sup>

#### 2. Agency Resources

Bilingual employees are essential to ensure a fully effective State government. Collectively, state agencies employed nearly 2,000 bilingual employees during fiscal year 2017, over 1,000 of whom worked for the Department of Human Services. In addition to spoken languages, over ten percent of the State's bilingual staff was fluent in American Sign Language and one percent could read Braille. On average bilingual staff handled 374 interactions during FY 2017. Sixty percent of agencies that reported encountering 15 or more bilingual interactions employed at least one bilingual staff member. During FY 2017 some agencies' bilingual staff handled up to 4,000 bilingual interactions per staff member. In addition to in-person staff members, over half of the agencies supplemented their bilingual services with the telephonic language interpreter services available through CMS,<sup>3</sup> as well as other resources. Some state agencies also publicized the availability of bilingual services through conspicuously posted notices in the languages most commonly encountered. Further, several agencies translated their websites, and most relevant written materials.

<sup>&</sup>lt;sup>1</sup> See, Governor Rauner's TEAM (Transparent, Ethical, Accountable, Motivated) website.

<sup>&</sup>lt;sup>2</sup> Language Access to Government Services Task Force Act, 20 ILCS 5095/5(1).

<sup>&</sup>lt;sup>3</sup> CMS Master Contract #CMS3672730 provides language interpreter services by way of a three-way telephone conversation.

#### **B.** CMS Survey Administration

CMS is the State agency designated to monitor State agencies' bilingual programs and to offer recommendations to enhance their capacity to effectively serve populations in need. In doing so, CMS endeavors to accurately assess the current needs of Illinois residents for bilingual services through a series of metrics and identify the proficiency of state agencies in meeting those needs by evaluating the agencies' capabilities and efforts.

This year, CMS added new questions to the online survey in an effort to better assess how well agencies are meeting the needs of Illinois residents. To that end, CMS developed uniform metrics that enable interagency comparisons and control for agency size, and degree of direct public contact. The results help agencies, legislators, CMS, the public, and other stakeholders better appreciate the State's efforts to address the need for bilingual services. This year, CMS supplemented its prior surveys with additional questions designed to obtain further information regarding bilingual needs and bilingual proficiency. Given that some of the additional questions sought data that had not been previously required, CMS assured agencies they could estimate their responses yet should implement tracking mechanisms by January 1, 2018 to collect the data necessary to enable full and complete responses for the 2019 BNBP survey.

A key component of this assessment is the self-reported data provided by the participating agencies. While we believe each agency made every effort to provide the best data available, we also recognize that some agencies have opportunities for improvement in tracking and compiling data regarding their interactions with the public. Recommendations for tactics to improve tracking are discussed in further detail below in this report. In addition, some agency participants could not respond to some of the survey questions. To fairly compare agencies and accurately report information, several criteria were adjusted for non-responses. These items are identified below in the Methodology section of the report.

To identify the bilingual needs of Illinois residents, the survey inquired across four vectors, including 1) Volume of Bilingual Interactions, 2) Duration of Bilingual Interactions, 3) Frequency of Bilingual interactions, and 4) Nature of Bilingual Interaction. To identify the proficiency of each agency in meeting those needs, the survey inquired across 4 vectors, including 1) Bilingual Interactions/Staff member, 2) Compliance with State Services Assurance Act, 3) Advertised Available Bilingual Services, and 4) Website translations.

For each of the vectors above, an evaluation system was created and point values were assigned to enable aggregation and comparison of scores for need and proficiency by agency. Thereafter, each agency was evaluated on whether, and to what degree, it was meeting the need identified. In order to compare across agencies, all agencies were then placed into a matrix showing their scores relative to each other. The matrix is provided in further detail below in the Methodology section.

#### C. Survey Results

One of the key learnings from this year's survey is that timely frequent tracking is critical. Several agencies acknowledged that they were not tracking interactions on a regular basis. Moreover, 35% of the agencies surveyed reported zero interactions that required bilingual services. While this is possible, better record keeping would increase the confidence in this result. Overall results for the survey indicate that there is significant need for bilingual services in Illinois. Nearly 700,000 bilingual interactions were reported during FY 2017. Of those with the highest interactions were critical agencies that serve Illinois, including the Departments of Aging, Agriculture, Children and Family Services, Employment Security, Human Rights, Human Services, Juvenile Justice, Public Health, Veterans Affairs and others. Almost half of the agencies reported that most of their bilingual interactions occurred on a weekly basis.

There are also several key actions that each agency can take to improve its proficiency in meeting the identified need. Only 40% of agencies subject to the State Services Assurance Act were in compliance. Further, 80% of agencies reported having English-only websites. Once improved, these areas would significantly elevate the proficiency of many of the agencies surveyed.

Most of the agencies surveyed either met or exceeded their relative needs for bilingual services. Thirty percent of agencies met their respective need for bilingual services and 22% exceeded their need. While 48% of the agencies surveyed were found to have a need that exceeded their proficiency, the majority of those were within one point of meeting the need. Moreover, translating their websites and publishing notices in the most often encountered languages would positively shift the proficiency rating of 46% of agencies surveyed.

Of particular concern is the distribution of interactions across agencies that are not meeting their respective needs. Nearly 95% of the interactions reported are with agencies that have a proficiency score below their need. As such, while the distribution of agencies is favorable, the distribution of interactions shows that there is significant improvement to be made in service levels for the Illinois residents.

Individual agency results are below.

BILINGUAL NEED v. BILINGUAL PROFICIENCY				
Agency	Overall Need Tier	Overall Proficiency Tier	Need - Proficiency Gap	BNBP MATRIX
Aging	1	4	-3	D
Agriculture	2	3	-1	С
Arts Council	4	3	1	Р
Capital Development Board	4	3	1	Р
Central Management Services	2	4	-2	Е
Children and Family Services	1	2	-1	В

BILINGUAL NEED v. BILINGUAL PROFICIENCY				
Agency	Overall Need Tier	Overall Proficiency Tier	Need - Proficiency Gap	BNBP MATRIX
Civil Service Commission	4	4	0	Р
Commerce and Economic Opportunity	1	4	-3	D
Corrections	2	3	-1	Н
Criminal Justice Information Authority	4	3	1	Р
Deaf and Hard of Hearing Commission	4	3	1	Р
Emergency Management Agency	4	4	0	Р
Employment Security	2	2	0	Н
Environmental Protection Agency	3	4	-1	I
Executive Ethics Commission	4	4	0	Р
Financial and Professional Regulation	2	4	-2	Е
Gaming Board	3	3	0	I
Guardianship and Advocacy Commission	3	4	-1	F
Healthcare and Family Services	2	4	-2	Е
Historic Preservation	3	3	0	I
Human Rights Commission	2	4	-2	С
Human Rights Department	2	3	-1	С
Human Services	2	3	-1	С
Illinois Commerce Commission	1	4	-3	D
Innovation and Technology	4	4	0	Р
Insurance	2	4	-2	E
Investment Board	4	4	0	Р
Juvenile Justice	2	4	-2	С
Labor Department	2	3	-1	С
Labor Relations Board	4	4	0	Р
Labor Relations Board - Educational	4	3	1	Р
Law Enforcement Training and Standards Board	4	3	1	0
Lottery	2	4	-2	С
Military Affairs	4	4	0	P
Natural Resources	3	4	-1	I
Office of Executive Inspector General	4	3	1	Р
Pollution Control Board	4	4	0	Р
Prisoner Review Board	2	3	-1	С
Procurement Policy Board	4		0	Р
Property Tax Appeal Board	4	4	0	Р

BILINGUAL N	BILINGUAL NEED v. BILINGUAL PROFICIENCY			
Agency	Overall Need Tier	Overall Proficiency Tier	Need - Proficiency Gap	BNBP MATRIX
Public Health	2	3	-1	С
Racing Board	4	4	0	J
Revenue	2	4	-2	E
State Fire Marshal	4	3	1	Р
State Police	4	3	1	Р
State Police Merit Board	4	4	0	Р
State Retirement Systems	4	3	1	Р
Transportation	4	3	1	Р
Veterans Affairs	3	4	-1	F
Workers Compensation Commission	3	4	-1	I

#### D. Recommendations

The primary area of improvement for all agencies is in tracking bilingual interactions. As indicated above, the survey results are contingent on the accuracy of the data provided. Moreover, to have accurate inter-agency comparisons, consistent recording is required. In addition to tracking, agencies translating their communication, in physical form and online, into the most frequently encountered languages will provide significantly greater access to the 10% of Illinois residents with limited English proficiency.

#### II. METHODOLOGY

#### A. Overview

The primary objective of administering this Bilingual Needs and Bilingual Pay (BNBP) Survey was to compare Illinois' need for bilingual services against its proficiency in meeting the need. Each year, CMS sends State agencies a survey to gather data and information regarding the bilingual interactions State agencies encountered during the previous fiscal year along with their proficiency to address their service population's bilingual need.

#### **B.** Survey Administration

For ease of use and distribution, the survey was disseminated online via Survey Money. The survey was administered to 51 agencies across different service areas in the state. The 50 agencies that responded reported various levels of public interaction, bilingual staffing, and methods of notifying the public that bilingual services were available.

This year, CMS supplemented its prior surveys with additional questions designed to obtain further information regarding bilingual needs and bilingual proficiency. Given that some of the additional questions sought data that had not been previously required, CMS assured agencies

they could estimate their responses yet should implement tracking mechanisms by January 1, 2018 to collect the data necessary to enable full and complete responses for the 2019 BNBP survey.<sup>4</sup>

The 2017 BNBP Survey was administered to 51 State agencies through Survey Monkey from November 15, 2017 through November 30, 2017. Some agencies that were not required to respond because they are not subject to the Personnel Code participated voluntarily. Agencies requesting extensions were given until December 8, 2017. All but one agency submitted a survey response.

The agency representatives who completed the BNBP Survey self-reported their agency's data and certified (a) the accuracy of their survey responses to the best of their knowledge after reasonable investigation, and (b) that the agency head reviewed and approved the survey responses before submission.

CMS reviewed and analyzed the agencies' survey responses and created this 2017 Bilingual Needs and Bilingual Pay Report, which it will submit to the General Assembly and make public by January 1, 2018.

#### C. Need Defined

In developing this survey CMS elected to choose four criteria to evaluate the bilingual need to be addressed by each agency. In doing so, CMS sought to gather data on the size and scope of interactions with the public that required bilingual services. As such, CMS elected to gather data on: (1) the volume of interactions with each agency, to better understand the amount of demands put on each agency; (2) the duration of the interactions with each agency, to better understand the amount of resources required for each agency; (3) the frequency of the interactions with each agency, to better understand the regularity of demands being put on each agency; and (4) the proportion of interactions requiring in-depth assistance, to better understand the scope of services provided and nature of bilingual needs.

#### D. Quantifying Agencies' Bilingual Need Through Four Metrics

#### 1. Volume of Bilingual Interactions

This first Bilingual Needs Metric is based on agencies' reported number of bilingual interactions encountered during fiscal year 2017. CMS ranked agencies' reported number of bilingual interactions during fiscal year 2017 and divided the results into quartiles around the median. Below are the parameters for each Bilingual Need Tier in the first Bilingual Need Metric.

<sup>&</sup>lt;sup>4</sup> Tracking mechanisms in place by January 1, 2018 will only capture data for the second half of the 2018 fiscal year, (i.e., January 1<sup>st</sup> through June 30<sup>th</sup> of 2018). Fiscal year 2019 will be the first full year agencies accurately and thoroughly count bilingual interactions using a formal tracking mechanism.

	Volume of Bilingual Interactions				
Tier	Bilingual Need	Criteria			
1	High	Top Quartile: 60+ bilingual interactions			
2	Medium	Second Quartile: 41-60 bilingual interactions			
3	Low	Third Quartile: 21-40 bilingual interactions			
4	Minimal	Fourth Quartile: 0-20 bilingual interactions			

#### 2. Duration of Bilingual Interactions

This second Bilingual Needs Metric is based on agencies' reported percentage of time staff spent handling bilingual interactions, from 0-15 minutes to longer than a workday. Agencies were ranked according to the length of the average duration of their bilingual interactions. Below are the parameters for each Bilingual Need Tier in the second Bilingual Need Metric.

	Duration of Bilingual Interaction				
Tier	Bilingual Need	Criteria			
1	High	50% or more of bilingual interactions lasted longer than 15 minutes			
2	Medium	20-49% of bilingual interactions lasted longer than 15 minutes			
3	Low	1-19% of bilingual interactions lasted longer than 15 minutes			
4	Minimal	0% of bilingual interactions lasted longer than 15 minutes			

#### 3. Frequency of Bilingual Interactions

This third Bilingual Needs Metric is based on agencies' reports regarding whether their bilingual staff handled bilingual interactions daily, weekly, monthly, or yearly. Agencies were ranked according to the proportion of their bilingual interactions that happened on a weekly basis. Below are the parameters for each Bilingual Need Tier in the third Bilingual Need Metric.

	Frequency of Bilingual Interaction				
Tier	Bilingual Need	Criteria			
1	High	50% or more of bilingual interactions occurred at least weekly			
2	Medium	20-49% of bilingual interactions occurred at least weekly			
3	Low	1-19% of bilingual interactions occurred at least weekly			
4	Minimal	0% of bilingual interactions occurred at least weekly			

#### 4. Proportion of Bilingual Interactions Requiring In-depth Assistance

This fourth Bilingual Needs Metric is based on agencies' reports regarding whether bilingual interactions required in-depth assistance. "In-depth assistance" was defined as "More than a brief written translation (the transference of meaning from text to text), and more than speech translation for the purpose of facilitating dialog; a commitment of extensive time and resources; the simultaneous or consecutive interpretation of complex concepts." Agencies were ranked according to the number of bilingual interactions requiring in-depth assistance. Below are the parameters for each Bilingual Need Tier in the fourth Bilingual Need Metric.

	Proportion of Bilingual Interactions Requiring In-depth Assistance				
Tier	Bilingual Need	Criteria			
1	High	50% or more of bilingual interactions required in-depth assistance			
2	Medium	20-49% of bilingual interactions required in-depth assistance			
3	Low	1-19% of bilingual interactions required in-depth assistance			
4	Minimal	0% of bilingual interactions required in-depth assistance			

#### E. Calculating Agencies' Overall Bilingual Need Tier

The Bilingual Need/Bilingual Proficiency Matrix requires each agency to fall within one Tier that captures bilingual need, which can then be evaluated against its one Tier for bilingual proficiency. Some agencies fall within different Tiers within the four bilingual need metrics. For example, an agency may have a high bilingual need (Tier 1) for the metric regarding frequency of bilingual interactions but a low bilingual need (Tier 4) for the metric regarding indepth assistance.

Accordingly, CMS implemented a point system to determine each agency's overall Tier for bilingual need.

#### 1. CMS' Point System for Determining Agencies' Overall Bilingual Need Tier

For each of the four metrics within bilingual need, CMS assigned points as follows: Agencies which fell within Tier 1 (High Need) for a bilingual need metric were assigned 1 point. Agencies which fell within Tier 2 (Medium Need) were assigned 2 points. Agencies which fell within Tier 3 (Low Need) were assigned 3 points. And agencies which fell within Tier 4 (Minimal Need) were assigned four points.

CMS tallied each agency's four scores for each bilingual need metric to calculate the agency's overall Bilingual Need Tier. Agencies that received a total score of 4 or fewer points were assigned Tier 1 (High Need). Agencies that received a total score between 5 and 8 points were assigned Tier 2 (Medium Need). Agencies that received a total score between 9 and 11 points were assigned Tier 3 (Low Need). And agencies that received a total score of greater than 11 points were assigned Tier 4 (Minimal Need).

#### F. Proficiency Defined

In developing this survey CMS elected to choose four criteria to evaluate the bilingual proficiency of each agency. In doing so, CMS sought to identify objectively measurable criteria which indicated each agencies ability and efforts in meeting the bilingual needs of Illinois residents. As such, CMS elected to gather data on: (1) the ratio of bilingual interactions per bilingual staff member, to better understand the capabilities of each agency in addressing the bilingual needs; (2) whether the agencies subject to the State Services Assurances Act were in compliance, to indicate whether each agency was staffing at levels deemed necessary and appropriate for their agency by the legislature; (3) whether agencies published public notices regarding the availability of bilingual services, to better understand each agency's efforts at public outreach and engagement for bilingual services; and (4) whether, and to what degree, agencies translate their websites and written materials into their most frequently encountered languages, to better understand each agency's efforts to become more accessible to individuals outside of their physical locations.

#### G. Quantifying Agencies' Bilingual Proficiency Through Four Metrics

Collection of the bilingual proficiency data required some tailoring due to the variations in how each agency records and reports certain criteria. Specifically, some agencies were not subject to the State Services Assurance Act, and others reported encountering zero bilingual interactions, bilingual staff, or both. As such, some metrics were modified to best represent the abilities and efforts of each agency. The descriptions of each modification is provided below with its respective criteria.

#### 1. Bilingual Interactions Per Bilingual Staff Member

This first Bilingual Proficiency Metric is based on agencies' reported number of bilingual interactions encountered during fiscal year 2017 as well as its number of bilingual employees. To determine the agencies' ranking for bilingual interactions per bilingual staff member, CMS used agencies' reported number of bilingual interactions, subtracted the number of bilingual interactions handled by the CMS master contract for language interpretation services, calculated the ratio of bilingual interactions per staff member, and divided the results into quartiles around the median. Below are the parameters for each Bilingual Proficiency Tier in the first Bilingual Proficiency Metric.

	Bilingual Interactions Per Bilingual Staff Member			
Tier	Bilingual Proficiency	Criteria		
1*	High	1-34 bilingual interactions per bilingual staff member		
2	Medium	35-69 bilingual interactions per bilingual staff member		
3	Low	70-104 bilingual interactions per bilingual staff member		
4	Minimal	105 or more bilingual interactions per bilingual staff member		

\* For those agencies which encountered no or minimal bilingual interactions during fiscal year 2017, CMS assigned Tier 1 (High Proficiency).

#### 2. Compliance with the State Services Assurance Act for FY2008

This second Bilingual Proficiency Metric is based on agencies' reports regarding whether they were in or out of compliance with the Act. The State Services Assurance Act for FY2008 requires 10 State agencies to increase and maintain the number of bilingual on-board frontline staff over the levels it maintained on June 30, 2007. Agencies identified in the Act and in compliance with the bilingual staffing requirements were assigned Tier 1 (High Proficiency). Agencies identified in the Act and not in compliance with the bilingual staffing requirements were assigned Tier 4 (Minimal Proficiency). Agencies not identified in the Act were assigned a Tier based on the agency's average of the other three proficiency Tiers. Below are the parameters for each Bilingual Proficiency Tier in the third Bilingual Proficiency metric.

	Compliance with State Services Assurance Act for FY2008			
Tier	Bilingual Proficiency	Criteria		
1	High	Agency identified in Act and in compliance / Agency not identified in Act: average Tier for remaining metrics		
2	Medium	Agency not identified in Act: average Tier for remaining metrics		
3	Low	Agency not identified in Act: average Tier for remaining metrics		
4	Minimal	Agency identified in Act and not in compliance / Agency not identified in Act: average Tier for remaining metrics		

# 3. Efforts to Inform the Public of Available Bilingual Services Through Posted Notices

A new question on the 2017 BNBP Survey sought agencies' efforts to publicize the availability of bilingual services through posted notices. This question was designed to identify how agencies advertise the availability of free bilingual services in order to minimize the risk that limited English populations will avoid the agency on the assumption that they will be unable to communicate effectively with the State (i.e., self-selection out of the agency's service population).

Agencies fell within Tier 1 (High Proficiency) if they reported posting notices of free bilingual services in conspicuous locations and in the most frequently encountered languages. Agencies fell within Tier 2 (Medium Proficiency) if they reported posting notices of free bilingual services in conspicuous locations but not in the most frequently encountered languages. Agencies fell within Tier 3 if they reported posting notices of free bilingual services but not in conspicuous locations. Agencies fell within Tier 4 if they reported they did not post notices of free bilingual services.

Some agencies did not have access to survey questions 21 through 26, which included a question seeking information about notices of bilingual services, since these questions were only available

to agencies which responded that they engaged in routine public contact and/or encountered a language other than English five percent or more of the time during fiscal year 2017.

Those agencies which did not engage in routine public contact or did not encounter a language other than English five percent or more of the time during fiscal year 2017 were assigned Tiers for this third Bilingual Proficiency Metric as follows: (a) if they employed bilingual staff they were assigned Tier 3 (Low Proficiency) on the assumption that they posted notices, and (b) if they did not employ bilingual staff they were assigned Tier 4 (Minimal Proficiency) on the assumption that they did not post notices for a service they were unable to provide.

Below are the parameters for each Bilingual Proficiency Tier in the third Bilingual Proficiency metric.

Ej	Efforts to Inform the Public of Available Bilingual Services Through Posted Notices			
Tier	Bilingual Proficiency	Criteria		
1	High	Agency posts notices of free bilingual services in conspicuous locations and in its most frequently encountered languages		
2	Medium	Agency posts notices of free bilingual services in conspicuous locations but not in its most frequently encountered languages		
3	Low	Agency posts notices of free bilingual services but not in conspicuous locations		
4	Minimal	Agency does not post notices of free bilingual services		

#### 4. Efforts to Inform the Public of Available Bilingual Services Through Website

Another new question on the 2017 BNBP Survey sought agencies' efforts to publicize the availability of bilingual services through its website. As with the third metric, this question was also designed to identify how agencies advertise the availability of free bilingual services in order to minimize the risk that limited English populations will avoid the agency on the assumption that they will be unable to communicate effectively with the State (i.e., self-selection out of the agency's service population). Agencies' efforts to inform the public of the availability of free bilingual services were ranked. Below are the parameters for each Bilingual Proficiency Tier in the fourth Bilingual Proficiency Metric.

	Efforts to Inform the Public of Available Bilingual Services Through Website			
Tier	Bilingual Proficiency	Criteria		
1	High	Agency translates its website into its most frequently encountered languages		
2	Medium	Agency translates at least part of its website into its most frequently encountered languages		
3	Low	Agency does not translate its website but posts documents that are translated into its most frequently encountered languages		
4	Minimal	Agency does not translate its website or post translated documents		

#### H. Calculating Agencies' Overall Bilingual Proficiency Tier

The Bilingual Need/Bilingual Proficiency Matrix requires each agency to fall within one Tier that captures bilingual proficiency, which can then be evaluated against its one Tier for bilingual proficiency. Some agencies fall within different Bilingual Proficiency Tiers for the four Bilingual Proficiency Metrics. For example, an agency may have a high bilingual proficiency (Tier 1) for the metric regarding the number of bilingual interactions per bilingual staff member but a low bilingual proficiency for posting conspicuously located notices regarding the availability of free bilingual services in the languages of its service population.

Accordingly, CMS implemented a point system to determine each agency's overall Tier for bilingual proficiency.

1. CMS' Point System for Determining Agencies' Overall Bilingual Proficiency Tier

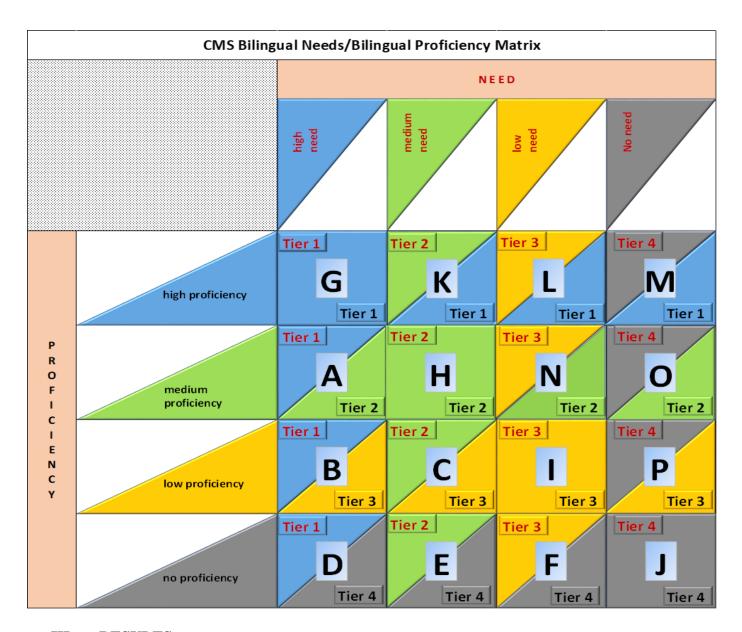
For each of the four metrics within bilingual proficiency, CMS assigned points as follows: Agencies which fell within Tier 1 (High Proficiency) for a bilingual proficiency metric were assigned 1 point. Agencies which fell within Tier 2 (Medium Proficiency) were assigned 2 points. Agencies which fell within Tier 3 (Low Proficiency) were assigned 3 points. And agencies which fell within Tier 4 (No Proficiency) were assigned four points.

CMS then tallied the total of the agency's four scores for each of the four bilingual proficiency metrics and assigned Tiers. Agencies that received a total score of 4 or fewer points were assigned Tier 1 (High Proficiency). Agencies that received a total score between 5 and 8 points were assigned Tier 2 (Medium Need Proficiency Agencies that received a total score between 9 and 11 points were assigned Tier 3 (Low Proficiency). And agencies that received a total score of greater than 11 points were assigned Tier 4 (Minimal Proficiency).

#### I. CMS Bilingual Need/Bilingual Proficiency Matrix

CMS' Bilingual Need/Bilingual Proficiency Matrix creates a landscape upon which all agencies surveyed can be equitably compared. The matrix reconciles each agency's overall Tier, based on the score for bilingual need, and does the same for bilingual proficiency. Thereafter, each agency's tiers are combined to identify if there is any difference between their need and proficiency. It is important to note that the matrix is data-dependent and therefore its accuracy is contingent on the survey responses provided. As CMS and State agencies grow their abilities to request and report the best data available, the value of the matrix will correspondingly increase. The matrix provided below represents all 16 potential outcomes from reconciling each agency's tier of need and proficiency. The letters associated with each potential outcome are provided for ease of comparison and navigation.

CMS' Bilingual Need/Bilingual Proficiency Matrix matches an agency's Bilingual Need Tier with its Bilingual Proficiency Tier and yields a letter code that quantifiably establishes the extent to which an agency's bilingual proficiency meets, exceeds, or does not meet bilingual need.



#### III. RESULTS

#### A. Results Are Data-Dependent and Current Data Set Is Incomplete

The usefulness of the Bilingual Need/Bilingual Proficiency Matrix is dependent upon accurate and thorough data. Some agencies have not yet implemented a system to track in real time all of the languages it encounters, but have been asked to create such systems by January 1, 2018. Moreover, CMS added questions to the 2017 BNBP Survey requesting previously unrequested data, and allowed agencies to estimate data that had not been aware they should track. Finally, agencies were not introduced to CMS' recently developed Bilingual Need/Bilingual Proficiency Matrix before completing the BNBP Survey.

CMS plans to revise the BNBP Survey to clarify ambiguities and reduce the number of agencies which cannot respond to certain questions. The goal is for the 2019 BNBP Report to be based on more robust and precise data.

For more detailed Results, see the Appendix.

#### B. NEED

The agency responses were aggregated across each of the four vectors to determine an overall tier score for their bilingual need. This is a key area where routine tracking and reporting is critical. Survey results indicate that nearly half of all agencies reported minimal need. This result was unexpected and indicates either a deficiency in tracking or a significant lack of engagement with the Illinois residents who are not proficient in English. Improvements in tracking in the future will help determine whether the potential lack of engagement exists.

The distribution of agencies need across the identified tiers is as follows:

BILINGUAL NEED						
HIGH MEDIUM LOW MINIMAL TOTAL						
4	16	7	23	50		
8% 32% 14% 46%						

### 1. High Need

Agency survey results, when aggregated across the four vectors (Volume of Interactions, Duration of Interactions, Frequency of Interactions, and Proportion of In-depth Interactions) resulting in them being placed into either a High, Medium, Low, or Minimal need ranking. The following agencies are identified as high need based on their results. (Recall High =1, Medium =2, Low =3, Minimal =4)

	BILINGUAL NEED							
Agency	Volume of interactions	Duration of interactions	Frequency of interactions	In-depth interactions	Total points	Overall Tier		
Aging	1	1	1	1	4	1		
Children and Family Services	1	1	1	1	4	1		
Commerce and Economic Opportunity	1	1	1	1	4	1		
Illinois Commerce Commission	1	1	1	1	4	1		

#### 2. Medium Need

Agency survey results, when aggregated across the four vectors (Volume of Interactions, Duration of Interactions, Frequency of Interactions, and Proportion of In-depth Interactions) resulting in them being placed into either a High, Medium, Low, or Minimal need ranking. The following agencies are identified as medium need based on their results. (Recall High =1, Medium =2, Low =3, Minimal =4)

		BILINGUAL	NEED			
Agency	Volume of interactions	Duration of interactions	Frequency of interactions	In-depth interactions	Total points	Overall Tier
Agriculture	1	1	1	2	5	2
Central Management Services	1	2	1	1	5	2
Corrections	1	1	1	2	5	2
Employment Security	1	2	1	1	5	2
Financial and Professional Regulation	1	2	1	2	6	2
Healthcare and Family Services	1	2	1	2	6	2
Human Rights Commission	1	2	1	4	8	2
Human Rights Department	1	2	1	2	6	2
Human Services	1	2	1	2	6	2
Insurance	1	2	1	3	7	2
Juvenile Justice	1	1	1	2	5	2
Labor Department	1	1	1	3	6	2
Lottery	1	2	1	2	6	2
Prisoner Review Board	1	1	2	1	5	2
Public Health	1	3	1	1	6	2
Revenue	1	3	1	1	6	2

#### 3. Low Need

Agency survey results, when aggregated across the four vectors (Volume of Interactions, Duration of Interactions, Frequency of Interactions, and Proportion of In-depth Interactions) resulting in them being placed into either a High, Medium, Low, or Minimal need ranking. The following agencies are identified as low need based on their results. (Recall High =1, Medium =2, Low =3, Minimal =4)

	BILINGUAL NEED								
Agency	Volume of interactions	Duration of interactions	Frequency of interactions	In-depth interactions	Total points	Overall Tier			
Environmental	2	4	1	2					
Protection Agency	2	4	1	2	9	3			
Gaming Board	4	3	1	3	11	3			
Guardianship and	3	1	2	3					
Advocacy Commission	3	1	2	J	9	3			
Historic Preservation	4	1	4	1	10	3			
Natural Resources	1	3	1	4	9	3			
Veterans Affairs	1	2	4	3	10	3			
Workers Compensation Commission	1	3	1	4	9	3			

#### 4. Minimal Need

Agency survey results, when aggregated across the four vectors (Volume of Interactions, Duration of Interactions, Frequency of Interactions, and Proportion of In-depth Interactions) resulting in them being placed into either a High, Medium, Low, or Minimal need ranking. The following agencies are identified as minimal need based on their results. (Recall High =1, Medium =2, Low =3, Minimal =4)

		BILINGUAL	NEED			
Agency	Volume of interactions	Duration of interactions	Frequency of interactions	In-depth interactions	Total points	Overall Tier
Arts Council	4	4	4	3	15	4
Capital Development Board	4	4	4	4	16	4
Civil Service Commission	4	4	4	4	16	4
Criminal Justice Information Authority	4	4	4	4	16	4
Deaf and Hard of Hearing Commission	4	4	4	4	16	4
Emergency Management Agency	4	4	4	4	16	4
Executive Ethics Commission	4	4	4	4	16	4
Innovation and Technology	4	3	4	4	15	4
Investment Board	4	4	4	4	16	4

		BILINGUAL	NEED			
Agency	Volume of interactions	Duration of interactions	Frequency of interactions	In-depth interactions	Total points	Overall Tier
Labor Relations Board	4	4	4	4	16	4
Labor Relations Board - Educational	4	4	4	4	16	4
Law Enforcement Training and Standards Board	4	4	4	4	16	4
Military Affairs	4	4	4	4	16	4
Office of Executive Inspector General	3	2	4	3	12	4
Pollution Control Board	4	4	4	4	16	4
Procurement Policy Board	4	4	4	4	16	4
Property Tax Appeal Board	4	4	4	4	16	4
Racing Board	4	4	4	4	16	4
State Fire Marshal	3	3	4	4	14	4
State Police	4	3	4	4	15	4
State Police Merit Board	4	4	4	4	16	4
State Retirement Systems	4	4	4	4	16	4
Transportation	2	3	4	4	13	4

#### C. PROFICIENCY

The agency responses were aggregated across each of the four vectors to determine an overall tier score for their bilingual proficiency. The survey results indicate that zero agencies scored a high proficiency rating, and over 50% of agencies scored minimal proficiency. The distribution of agencies need across the identified tiers is as follows:

BILINGUAL PROFICIENCY							
HIGH	MEDIUM	LOW	MINIMAL	TOTAL			
0	2	20	28	50			
0%	4%	40%	56%				

#### 1. Medium Proficiency\* (Zero agencies scored high proficiency)

Agency survey results, when aggregated across the four vectors (Interactions per Bilingual Employee, Compliance with the State Services Assurance Act, Publication of Notices of Available Bilingual Services, and Website and Document Translation) resulting in them being placed into either a High, Medium, Low, or Minimal need ranking. The following agencies are identified as medium proficiency based on their results. (Recall High =1, Medium =2, Low =3, Minimal =4)

	BILINGUAL PROFICIENCY							
Agency	Interactions per Employee	SSAA Compliance	Notices	Website / Documents	Total Points	Overall Tier		
Children and Family Services	1	4	1	2	8	2		
Employment Security	2	1	1	1	5	2		

#### 2. Low Proficiency

Agency survey results, when aggregated across the four vectors (Interactions per Bilingual Employee, Compliance with the State Services Assurance Act, Publication of Notices of Available Bilingual Services, and Website and Document Translation) resulting in them being placed into either a High, Medium, Low, or Minimal need ranking. The following agencies are identified as low proficiency based on their results. (Recall High =1, Medium =2, Low =3, Minimal =4)

	BILINGUAL PROFICIENCY								
Agency	Interactions per EE	SSAA Compliance	Notices	Website / Documents	Total Points	Overall Tier			
Agriculture	2	3	2	4	11	3			
Arts Council	1	3	3	4	11	3			
Capital Development Board	1	3	3	4	11	3			
Corrections	1	1	3	4	9	3			
Criminal Justice Information Authority	1	2	2	4	9	3			
Deaf and Hard of Hearing Commission	1	2	2	4	9	3			
Gaming Board	1	3	3	4	11	3			
Historic Preservation	1	3	3	4	11	3			
Human Rights Department	3	2	1	3	9	3			

	В	ILINGUAL PRO	FICIENCY			
Agency	Interactions per EE	SSAA Compliance	Notices	Website / Documents	Total Points	Overall Tier
Human Services	4	4	1	2	11	3
Labor Department	2	3	3	3	11	3
Labor Relations Board - Educational	1	3	3	4	11	3
Law Enforcement Training and Standards Board	1	2	3	3	9	3
Office of Executive Inspector General	1	3	3	4	11	3
Prisoner Review Board	1	3	3	4	11	3
Public Health	4	1	1	3	9	3
State Fire Marshal	1	3	3	4	11	3
State Police	1	4	1	4	10	3
State Retirement Systems	1	3	3	4	11	3
Transportation	1	3	3	4	11	3

## 3. Minimal Proficiency

Agency survey results, when aggregated across the four vectors (Interactions per Bilingual Employee, Compliance with the State Services Assurance Act, Publication of Notices of Available Bilingual Services, and Website and Document Translation) resulting in them being placed into either a High, Medium, Low, or Minimal need ranking. The following agencies are identified as minimal proficiency based on their results. (Recall High =1, Medium =2, Low =3, Minimal =4)

BILINGUAL PROFICIENCY								
Agency	Interactions per EE	SSAA Compliance	Notices	Website / Documents	Total Points	Overall Tier		
Aging	4	3	2	4	13	4		
Central Management Services	3	3	3	4	13	4		
Civil Service Commission	1	3	4	4	12	4		
Commerce and Economic Opportunity	3	3	3	4	13	4		
Emergency Management Agency	1	3	4	4	12	4		

	В	ILINGUAL PRO	FICIENCY			
Agency	Interactions per EE	SSAA Compliance	Notices	Website / Documents	Total Points	Overall Tier
Environmental	1	4	3	4		
Protection Agency	1	7	,	7	12	4
Executive Ethics	1	3	4	4		
Commission	-	J	·		12	4
Financial and	4	3	4	1		
Professional Regulation					12	4
Guardianship and	1	3	4	4	_	
Advocacy Commission					12	4
Healthcare and Family	4	3	1	4	10	
Services					12	4
Human Rights	2	3	4	3	42	
Commission					12	4
Illinois Commerce	4	4	3	4	1 -	4
Commission					15	4
Innovation and	1	3	4	4	12	4
Technology Insurance	4	3	1	4	12	
		3		4	12	4
Investment Board Juvenile Justice	4	1	4	4	13	4
Labor Relations Board		3				4
	1		4	4	12	4
Lottery	4	3	4	2	13	4
Military Affairs	1	3	4	4	12	4
Natural Resources	1	4	3	4	12	4
Pollution Control Board	1	3	4	4	12	4
Procurement Policy	1	3	4	4	10	
Board					12	4
Property Tax Appeal	1	3	4	4	42	
Board	4	2		4	12	4
Racing Board	1	3	4	4	12	4
Revenue	4	4	3	4	15	4
State Police Merit	1	3	4	4	4.0	
Board					12	4
Veterans Affairs	4	4	4	4	16	4
Workers						
Compensation	2	3	3	4	4.2	
Commission					12	4

#### D. BILINGUAL NEED/BILINGUAL PROFICIENCY MATRIX

As indicated above, the agency responses were calculated and ranked for both their need and proficiency. Thereafter, each agency's need was compared to its proficiency to determine if any difference existed. The results of the survey showed that 48% of agencies' proficiency was at a lower tier than their need. Agencies that met the need, i.e., their proficiency was equal to the need, represented 30% of the respondents, and 11% had a proficiency tier that exceeded their need tier.

In addition to measuring the need/proficiency distribution by agency, CMS also measured the distribution based on the total volume of recorded interactions. This step was taken to determine whether the public's experience with the state, as a whole, was comparably distributed to the agencies. The results were the opposite. Almost 97% of the interactions were with agencies whose proficiency was below the identified need and only .02% of interactions were with an agency whose proficiency exceeded their need. The overall results and distribution are provided below.

Need - Proficiency Gap			
Does			
Not			
meet	Meets	Exceeds	Total
need	Need	Need	Agencies
24	15	11	50
48%	30%	22%	
Need - P	roficiency	Gap (Does I	Not Meet)
			Total
-3	-2	-1	Agencies
3	8	13	24
13%	33%	54%	
Need - P	roficiency	/ Gap (Excee	eds Need)
			Total
+1	+2	+3	Agencies
11	1	0	11
100%	9%	0%	
	Does Not meet need  24 48%  Need - P  -3  3 13%  Need - F  +1 11	Does Not meet Meets need Need  24 15 48% 30%  Need - Proficiency  -3 -2  3 8 13% 33%  Need - Proficiency  +1 +2 11 1	Does Not meet         Meets Need         Exceeds Need           24         15         11           48%         30%         22%           Need - Proficiency Gap (Does In 1997)           3         8         13           13%         33%         54%           Need - Proficiency Gap (Exceeds)           +1         +2         +3           11         1         0

	Need - Proficiency Gap			
	Does			
	Not			
	Meet	Meets	Exceeds	Total
	Need	Need	Need	Interactions
	670,363	25,016	114	695,493
	96.39%	3.60%	0.02%	
SI				
Interactions	Need - P	roficiency	Gap (Does	Not Meet)
act				Total
ıteı	-3	-2	-1	Interactions
	5,538	426,825	238,000	670,363
	1%	64%	36%	
	Need -	Proficiency	Gap (Exce	eds Need)
				Total
	+1	+2	+3	Interactions
	114	0	0	114
	100%	0%	0%	

1. Did Not Meet Need

The Bilingual Need/Bilingual Proficiency Matrix identified the following agencies in which bilingual proficiency does not meet bilingual need: (Recall High =1, Medium =2, Low =3, Minimal =4)

BILINGU	BILINGUAL NEED v. BILINGUAL PROFICIENCY			
Agency	Overall Need Tier	Overall Proficiency Tier	Need - Proficiency Gap	BNBP MATRIX
Aging	1	4	-3	D
Agriculture	2	3	-1	С
Central Management Services	2	4	-2	E
Children and Family Services	1	2	-1	В
Commerce and Economic	4		-3	D
Opportunity	1	4		
Corrections	2	3	-1	H
Environmental Protection Agency	3	4	-1	I
Financial and Professional Regulation	2	4	-2	Е
Guardianship and Advocacy Commission	3	4	-1	F
Healthcare and Family Services	2	4	-2	E
Human Rights Commission	2	4	-2	C
Human Rights Department	2	3	-1	С
Human Services	2	3	-1	С
Illinois Commerce Commission	1	4	-3	D
Insurance	2	4	-2	E
Juvenile Justice	2	4	-2	С
Labor Department	2	3	-1	С
Lottery	2	4	-2	С
Natural Resources	3	4	-1	1
Prisoner Review Board	2	3	-1	С
Public Health	2	3	-1	С
Revenue	2	4	-2	E
Veterans Affairs	3	4	-1	F
Workers Compensation Commission	3	4	-1	I
COMMINISSION	3	4		

#### 2. Meets Need

The Bilingual Need/Bilingual Proficiency Matrix identified the following agencies in which bilingual proficiency meets bilingual need: (Recall High =1, Medium =2, Low =3, Minimal =4)

BILINGUAL NEED v. BILINGUAL PROFICIENCY				
Agency	Overall Need Tier	Overall Proficiency Tier	Need - Proficiency Gap	BNBP MATRIX
Civil Service Commission	4	4	0	Р
Emergency Management Agency	4	4	0	Р
Employment Security	2	2	0	Н
Executive Ethics Commission	4	4	0	Р
Gaming Board	3	3	0	1
Historic Preservation	3	3	0	1
Innovation and Technology	4	4	0	Р
Investment Board	4	4	0	Р
Labor Relations Board	4	4	0	Р
Military Affairs	4	4	0	Р
Pollution Control Board	4	4	0	Р
Procurement Policy Board	4	4	0	Р
Property Tax Appeal Board	4	4	0	Р
Racing Board	4	4	0	J
State Police Merit Board	4	4	0	Р

## 3. Exceeds Need

The Bilingual Need/Bilingual Proficiency Matrix identified the following agencies in which bilingual proficiency exceeds bilingual need: (Recall High =1, Medium =2, Low =3, Minimal =4)

BILINGUAL NEED v. BILINGUAL PROFICIENCY				
Agency	Overall Need Tier	Overall Proficiency Tier	Need - Proficiency Gap	BNBP MATRIX
Arts Council	4	3	1	Р
Capital Development Board	4	3	1	Р
Criminal Justice Information			1	
Authority	4	3	1	Р
Deaf and Hard of Hearing			1	Р
Commission	4	3	1	Р
Labor Relations Board - Educational	4	3	1	р
Law Enforcement Training and Standards Board	4	3	1	Р
Office of Executive Inspector General	4	3	1	Р

BILINGUAL NEED v. BILINGUAL PROFICIENCY				
Agency Overall Proficiency Tier Need - Proficiency Gap MATRIX				
State Fire Marshal	4	3	1	Р
State Police	4	3	1	Р
State Retirement Systems	4	3	1	Р
Transportation	4	3	1	Р

#### IV. ANALYSIS

#### A. Data Verification

The greatest learning for CMS in compiling and analyzing this information is in the need for the state, as a whole to improve on its data collection and reporting for bilingual needs and bilingual services provided. This is due, in part, to the fact that this year's survey is significantly more robust than in previous years. As such, there is an adjustment period to collecting additional data. In the interest of providing the best information possible, CMS agreed to accept agencies' best estimates for their bilingual interaction for this year. However, in the future, agencies should make every effort to track and report their interactions in a regular and systematic way.

#### **B.** Need Analysis

Some of the key learnings from our analysis of areas of need are in the distribution of need across agencies. Specifically, three agencies (Health and Family Services, Human Services, and Employment Security) represent 90% of the bilingual interactions reported for this fiscal year. The fact that the need is concentrated signifies the opportunity for major gains with focused efforts for agencies with a high number of interactions. Moreover, as reporting improves and more best practices are identified and shared, those agencies with high bilingual interactions can begin to be the thought leaders on best ways to serve the population.

Second, the fact that over one third of the agencies surveyed reported zero interactions with bilingual populations warrants further study. As indicated above, this could be due to a deficiency in tracking and reporting. However, of greater concern is the possibility that Illinois residents who are not proficient in English are not participating in the work of important agencies including the Executive Ethics Commission, State Police, Emergency Management, and others.

#### C. Proficiency Analysis

The need for improved bilingual proficiency is significant across all agencies surveyed. As indicated above, 96% of agencies surveyed scored in low or minimal proficiency. The 4% of agencies that scored medium proficiency also represent 4% of the interactions reported for this fiscal year. Thus 96% of interactions were with agencies whose proficiency was low or minimal. While 62% of agencies scored in Tier 1 for bilingual interactions per employee, more than half

of those agencies (17 in total) reported zero interactions. Moreover, of the 31 agencies that scored in Tier 1 for this metric only 5 (Children and Family Services, Corrections, Environmental Protection, Natural Resources, and Prisoner Review Board) reported more than 50 interactions for the fiscal year. In total, these agencies who had greater than 50 interactions and Tier 1 interactions per employee represent only 2% of the total interactions reported. As such, resources available for Illinois residents who are not proficient in English is an area that is in significant need for improvement. This is bolstered by the fact that only 40% of those agencies subject to the SSAA were in compliance based on their reported number of bilingual employees. In short, staffing of bilingual employees is a strong area of opportunity to improve proficiency for agencies.

One additional area that warrants further review is in the availability of publications of materials for Illinois residents who are not proficient in English. As indicated above, only 16% (8 agencies) scored in Tier 1 for providing notification of available bilingual services. Of those agencies, only 1, Employment Security, also is ranked in Tier 1 for translating its website into the languages with which it interacts most frequently. Moreover, 80% of the agencies surveyed reported having English-only websites. Had these agencies published their websites and documents beyond English only, the number of agencies who scored Tier 2 (medium) for proficiency would increase 250% and the number of agencies who scored in Tier 4 (minimal) would decrease by 75%. Written communication is one of the primary ways in which Illinois residents interact with state agencies. As such, access to written communication is critical to the service level provided to Illinois residents who are not proficient in English. Therefore, improvements in publication of availability of services and website information is a great opportunity to better serve that population of Illinois residents who are not proficient in English.

#### D. Matrix (Gap) Analysis

When compared, the need relative to the proficiency of each agency serves as a metric to compare across agencies with varying areas of service. In review, almost half (48%) of agencies scored with a need score that exceeded their proficiency. Those agencies, however, represent the overwhelming majority of reported interactions at 96%. Thus, the bulk of Illinois residents who are not proficient in English have unmet needs when dealing with the state of Illinois. While this is a matter of significant importance, the areas of opportunity to improve proficiency are well within reach. Almost all (99%) of those agencies and interactions would significantly, if not completely, close their gap between proficiency and need by improving their publications, notices, and online materials. It is worth noting that only 1% of reported interactions were with agencies who scored the maximum deficiency between need and proficiency. Overall, the key takeaway from this matrix is that most agencies have important areas to improve upon, and those improvements should have a striking difference in the experience of Illinois residents who are not proficient in English.

#### V. CMS RECOMMENDATIONS

Agencies have made great strides in developing bilingual programs since the first Bilingual Needs and Bilingual Pay Report was published in 2010. As bilingual programs and expectations evolve, CMS offers the following recommendations. In the coming year, CMS plans to assist

agencies in conjunction with the African-American, Hispanic, and Asian-American Employment Plan Advisory Councils by offering strategies to improve their ability to anticipate and meet the bilingual needs of their service populations. CMS recommends that all agencies improve their data collection procedures, conduct periodic self-evaluations using the CMS Bilingual Needs/Bilingual Proficiency Matrix, develop a formal assessment process to determine number of bilingual staff needed to address bilingual service population, evaluate language proficiency assessments, publicize the availability of free bilingual services, make suggestion forms available regarding the agency's bilingual program, and draft written policies regarding the agency's bilingual programs.

CMS recommends that agencies in which bilingual proficiency does not meet bilingual need should additionally consider strengthening their bilingual workforce, beginning or increasing usage of the CMS master contract for telephonic language services, and initiating proactive efforts.

#### A. General Recommendations

1. Improve Data Collection Procedures

CMS' data-driven Bilingual Needs/Bilingual Proficiency Matrix renders it essential that State agencies accurately and thoroughly track in real time all of the data requested in the Bilingual Needs and Bilingual Pay Survey. Agencies should track the language, including English, used in each public interaction, including those conducted in person, via telephone, and via email. Currently, many agencies estimate some or all this data. None of the agencies report tracking English interactions, which enables the calculation of the proportion of each language encountered to the entire pool of languages.

CMS recommends that appropriate agency personnel (e.g., EEO Officer, Human Resources staff, Bilingual Needs Committee members) collect agency data directly from those using bilingual skills on a monthly basis, and maintain a master spreadsheet with the data and totals broken down by month and year. In the future, agencies will be asked to submit these spreadsheets with their responses to CMS' annual BNBP Survey.

2. Conduct Periodic Self-Evaluations Using the CMS Bilingual Needs/Bilingual Proficiency Matrix

Agencies are advised to use the methodology explained in this BNBP Report as a tool to enable self-evaluations throughout the year to continuously measure their bilingual proficiency performance and modify their programs accordingly.

3. Develop a Formal Assessment Process to Determine Number of Bilingual Staff Needed to Address Bilingual Service Population

Agencies that have not already done so, should develop a formal assessment process to determine the appropriate number of bilingual staff necessary to address the agency's bilingual service population.

Agencies may find it helpful to use a formula similar to that used by the State of California which calculates the proportion of government encounters in a particular language at each facility and requires a corresponding proportion of bilingual staff in that language at that facility.

Agencies are also encouraged to consider census data regarding the limited English population of the agency's service population, including geographic region and those directly impacted by the agency's function.

#### 4. Evaluate Language Proficiency Assessments

Illinois law requires agencies to ensure bilingual employees possess appropriate bilingual capabilities to serve the significant numbers of people with limited English proficiency. Agencies should review their language proficiency assessments to ensure they are sufficiently robust and (a) can identify fluency, (b) are closely related to the job duties for the position, and (c) include common industry terms.

#### 5. Publicize the Availability of Free Bilingual Services

Agencies should publicize the availability of free bilingual services by posting notices in conspicuous locations and in the languages most commonly encountered, translating the most important and most visited portions of their websites into the languages most commonly encountered, and translating their most important and most disseminated written materials into the languages most commonly encountered.

# 6. Make Suggestion Forms Available Regarding the Agency's Bilingual Program

If agencies develop suggestion forms and make them available to the public, the contributions could serve useful for raising previously uncontemplated issues with the potential to improve State government.

#### 7. Draft Written Policies Regarding the Agency's Bilingual Programs

CMS recommends that agencies draft written policies regarding their bilingual programs, including the agency's formal assessment process for determining the number of bilingual staff needed to meet its service population's bilingual needs; the agency's language proficiency evaluations for bilingual job candidates; the agency's mechanism for tracking bilingual language interactions; and which government services, websites, and written materials will be offered in languages other than English, at a minimum.

# B. Recommendations for State Agencies in Which Bilingual Proficiency Does Not Meet Bilingual Need

Agencies may find that by implementing the General Recommendations above, they reduce or eliminate the gap between their bilingual proficiency and bilingual need. In addition, implementing the following recommendations may prove helpful.

- 1. Strengthen the Bilingual Workforce
  - a. Increase the number of bilingual staff to relieve the volume of bilingual transactions they handle
  - b. Raise employment budget allocation for bilingual employees to include recruitment and retention in addition to the bilingual pay supplement
  - c. Provide training for all staff members whose job duties impact the agency's bilingual needs program, including those involved in creating or modifying job descriptions to include, add, or eliminate a bilingual designation; those involved in recruiting, interviewing, and hiring bilingual employees; and frontline employees with direct public contact
  - d. Solicit and review voluntary feedback from current and departing bilingual employees regarding their perspective about the State's and agency's bilingual program and their work environments
- 2. Begin or increase usage of the CMS master contract for telephonic language services
- 3. Initiate Proactive Efforts
  - a. Form a committee tasked with monitoring and enhancing the agency's bilingual program
  - b. Encourage employees whose duties impact the agency's bilingual workforce (e.g., Diversity, Human Resources, Affirmative Action staff) to attend meetings of the Hispanic, African-American, and Asian-American Employment Plan Advisory Councils to seek guidance and learn best practices

In the coming year, CMS plans to assist agencies in conjunction with the African-American, Hispanic, and Asian-American Employment Plan Advisory Councils by offering strategies to improve their ability to anticipate and meet the bilingual needs of their service populations.

#### VI. BEST PRACTICES

CMS did not solicit best practices from agencies in the 2017 BNBP Survey. Therefore, these best practices do not fully capture agencies' efforts to positively impact their bilingual programs.

#### A. Careful Tracking of Bilingual Interactions

Agencies including the Department of Revenue, the Illinois Commerce Commission, and the Guardianship and Advocacy Commission use computer software to track bilingual interactions.

#### **B.** Utilizing Other Translation Resources

Some agencies have gone beyond the CMS master contract for language services and supplemented their proficiency via external translation resources, including Children and Family Services, the Department of Employment Security, the Department of Human Rights, Human Services, and the Office of the Executive Inspector General.

#### C. Bilingual Programs

Agency representatives were asked what they liked best about their bilingual programs. Responses highlighted:

- leveraging data to inform decision making (Guardianship and Advocacy Commission)
- gathering data from a wide variety of sources for a more accurate assessment (Employment Security)
- considering census data regarding the agency's service population (Children and Family Services)
- participating in a pilot program to increase bilingual staff (Corrections)
- focusing on work location rather than the entire agency so bilingual efforts are tailored to the needs of the local rather than statewide population (Human Services)
- proactively reviewing job descriptions for opportunities to include a bilingual designation (Public Health)
- strong communication among agency staff at all levels (Agriculture, Commerce and Economic Opportunity, Natural Resources, Workers Compensation Commission, State Fire Marshal),
- valuing bilingual employees and equal access to people with limited English proficiency (Deaf and Hard of Hearing Commission)
- flexibility (Aging)
- fairness and consistency (Insurance)

#### D. Publicizing the Availability of Bilingual Services

Many agencies post notices of the availability of bilingual services in conspicuous locations and in the languages most frequently encountered, including Children and Family Services, Employment Security, Healthcare and Family Services, Department of Human Rights, Human Services, Public Health, and the State Police.

CMS applauds agencies' efforts to translate portions of their websites (Children and Family Services, Employment Security, Financial and Professional Regulation, Historic Preservation, Human Services, Lottery, Public Health), and/or documents posted on their websites (Children and Family Services, Department of Human Rights, Department of Labor, Public Health).

#### E. Proactive Approaches

The Department of Revenue holds quarterly staff meetings to review and contemplate improvements to the agency's bilingual program, maintains active relationships with community organizations to understand the bilingual needs of various communities and ascertain and how

can best serve them, and strives to provide multiple language options at each of its frontline facilities.

#### VII. CMS CONTACT

We invite anyone with questions, suggestions, concerns, or other comments to contact the Deputy Director of Diversity and Inclusion for CMS at <u>Lisa.g.williams@illinois.gov</u> or (312) 814-8213.

# DEPARTMENT OF CENTRAL MANAGEMENT SERVICES

Michael M. Hoffman, Acting Director

#### I. RESULTS

## A. Quantifying Agencies' Bilingual Need Through Four Metrics

ILLINOIS

#### 1. Volume of Bilingual Interactions

Tier 1 (High Need): Top quartile......60+ bilingual interactions

Agency	# Bilingual Interactions
Healthcare and Family Services	396,642
Human Services	203,496
Employment Security	24,971
Public Health	17,579
Revenue	16,907
Corrections	9,927
Lottery	7,324
Aging	4,199
Human Rights Department	2,746
Insurance	2,716
Children and Family Services	2,473
Financial and Professional Regulation	1,700
Commerce and Economic Opportunity	774
Juvenile Justice	764
Labor Department	620
Central Management Services	572
Illinois Commerce Commission	565
Prisoner Review Board	500
Human Rights Commission	200
Workers Compensation Commission	185
Natural Resources	175
Veterans Affairs	150
Agriculture	60

Tier 2 (Medium Need): Second quartile .......41-60 bilingual interactions

Agency	# Bilingual Interactions
Transportation	50
Environmental Protection Agency	59

Tier 3 (Low Need): Third quartile ......21-40 bilingual interactions

Agency	# Bilingual Interactions
Guardianship and Advocacy Commission	30
Office of Executive Inspector General	30
State Fire Marshal	29

Tier 4 (Minimal Need): Fourth quartile ......0-20 bilingual interactions

Agency	# Bilingual Interactions
Gaming Board	20
Historic Preservation	15
Innovation and Technology	10
Arts Council	3
Labor Relations Board - Educational	2
Capital Development Board	0
Civil Service Commission	0
Criminal Justice Information Authority	0
Deaf and Hard of Hearing Commission	0
Emergency Management Agency	0
Executive Ethics Commission	0
Investment Board	0
Labor Relations Board	0
Law Enforcement Training and Standards Board	0
Military Affairs	0
Pollution Control Board	0
Procurement Policy Board	0
Property Tax Appeal Board	0
Racing Board	0
State Police	0
State Police Merit Board	0
State Retirement Systems	0

# b. Duration of Bilingual Interactions

Tier 1 (High Need):.....50% or more of Bilingual Interactions Lasted Longer Than 15 Minutes

Agency	50% or more last longer than 15 minutes
Children and Family Services	100
Juvenile Justice	100
Historic Preservation	100

Agency	50% or more last longer than 15 minutes
Aging	90
Guardianship and Advocacy Commission	90
Corrections	65
Prisoner Review Board	65
Commerce and Economic Opportunity	63
Labor Department	50
Illinois Commerce Commission	50
Agriculture	50

Tier 2 (Medium Need):.....20-49% of Bilingual Interactions Lasted Longer Than 15 Minutes

Agency	20 to 49% last longer than 15 minutes
Healthcare and Family Services	49
Central Management Services	46
Insurance	40
Veterans Affairs	40
Financial and Professional Regulation	35
Human Rights Department	31
Employment Security	30
Human Services	25
Lottery	23
Human Rights Commission	20
Office of Executive Inspector General	20

Tier 3 (Low Need):.....1-19% of Bilingual Interactions Lasted Longer Than 15 Minutes

Agency	1-19% last longer than 15 minutes
Public Health	10
State Fire Marshal	10
Gaming Board	10
Innovation and Technology	10
Revenue	7
Natural Resources	5
State Police	10
Transportation	5
Workers Compensation Commission	3

Tier 4 (Minimal Need): ....0% of Bilingual Interactions Lasted Longer Than 15 Minutes

Agency	0% last longer than 15 minutes
Arts Council	0
Capital Development Board	0
Civil Service Commission	0
Criminal Justice Information Authority	0
Deaf and Hard of Hearing Commission	0
Emergency Management Agency	0
Environmental Protection Agency	0
Executive Ethics Commission	0
Investment Board	0
Labor Relations Board	0
Labor Relations Board - Educational	0
Law Enforcement Training and Standards Board	0
Military Affairs	0
Pollution Control Board	0
Procurement Policy Board	0
Property Tax Appeal Board	0
Racing Board	0
State Police Merit Board	0
State Retirement Systems	0

# c. Frequency of Bilingual Interactions

Tier 1 (High Need):.....50% or more of bilingual interactions occurred at least weekly

Agency	50% or more occur at least weekly
Lottery	100
Aging	100
Insurance	100
Children and Family Services	100
Juvenile Justice	100
Labor Department	100
Central Management Services	100
Illinois Commerce Commission	100
Workers Compensation Commission	100
Agriculture	100
Environmental Protection Agency	100
Public Health	99
Employment Security	98
Healthcare and Family Services	92

Agency	50% or more occur at least weekly
Corrections	90
Financial and Professional Regulation	90
Human Rights Commission	90
Human Rights Department	88
Revenue	83
Human Services	67
Commerce and Economic Opportunity	53
Natural Resources	50
Gaming Board	50

Tier 2 (Medium Need):.....20-49% of bilingual interactions occurred at least weekly

Agency	20-49% occur at least weekly
Prisoner Review Board	40
Guardianship and Advocacy Commission	25

Tier 3 (Low Need):.....1-19% of bilingual interactions occurred at least weekly

No agencies fell within Tier 3.

Tier 4 (Minimal Need): ....0% of bilingual interactions occurred at least weekly

Agency	0% occur at least weekly
Veterans Affairs	0
Transportation	0
Office of Executive Inspector General	0
State Fire Marshal	0
Historic Preservation	0
Innovation and Technology	0
Arts Council	0
Labor Relations Board - Educational	0
Capital Development Board	0
Civil Service Commission	0
Criminal Justice Information Authority	0
Deaf and Hard of Hearing Commission	0
Emergency Management Agency	0
Executive Ethics Commission	0
Investment Board	0
Labor Relations Board	0
Law Enforcement Training and Standards Board	0

Agency	0% occur at least weekly
Military Affairs	0
Pollution Control Board	0
Procurement Policy Board	0
Property Tax Appeal Board	0
Racing Board	0
State Police	0
State Police Merit Board	0
State Retirement Systems	0

### d. Bilingual Interactions Requiring In-depth Assistance

Tier 1 (High Need):.....50% or more of Bilingual Interactions Required In-depth Assistance

Agency	50% or more require in-depth assistance
Employment Security	100
Revenue	100
Children and Family Services	100
Illinois Commerce Commission	100
Historic Preservation	100
Aging	75
Prisoner Review Board	75
Public Health	73
Central Management Services	60
Commerce and Economic Opportunity	53

Tier 2 (Medium Need):....20-49% of Bilingual Interactions Required In-depth Assistance

Agency	20-49% require in-depth assistance
Healthcare and Family Services	38
Corrections	35
Human Rights Department	35
Financial and Professional Regulation	30
Lottery	27
Human Services	25
Agriculture	25
Juvenile Justice	20
Environmental Protection Agency	20

Tier 3 (Low Need):.....1-19% of Bilingual Interactions Required In-depth Assistance

Agency	1-19% require in-depth assistance
Insurance	10
Veterans Affairs	10
Office of Executive Inspector General	10
Gaming Board	10
Labor Department	1
Guardianship and Advocacy Commission	1
Arts Council	1

Tier 4 (Minimal Need): ....0% of Bilingual Interactions Required In-depth Assistance

Agency	0% require in-depth assistance
Human Rights Commission	0
Workers Compensation Commission	0
Natural Resources	0
Transportation	0
State Fire Marshal	0
Innovation and Technology	0
Labor Relations Board - Educational	0
Capital Development Board	0
Civil Service Commission	0
Criminal Justice Information Authority	0
Deaf and Hard of Hearing Commission	0
Emergency Management Agency	0
Executive Ethics Commission	0
Investment Board	0
Labor Relations Board	0
Law Enforcement Training and Standards Board	0
Military Affairs	0
Pollution Control Board	0
Procurement Policy Board	0
Property Tax Appeal Board	0
Racing Board	0
State Police	0
State Police Merit Board	0
State Retirement Systems	0

# B. Calculating Agencies' Overall Bilingual Need Tier

Below is a chart of the agencies' scores using the point system to calculate each agency's overall Tier for bilingual need.

BILINGUAL NEED						
Agency	Volume of	Duration of	Frequency of	In-depth	Overall	Total
Agency	interactions	interactions	interactions	interactions	Tier	points
Aging	1	1	1	1	1	4
Agriculture	1	1	1	2	2	5
Arts Council	4	4	4	3	4	15
Capital						
Development	4	4	4	4	4	16
Board						
Central						
Management	1	2	1	1	2	5
Services						
Children and	1	1	1	1	1	4
Family Services	_	_	_	_	-	
Civil Service	4	4	4	4	4	16
Commission	•	•	•	•	•	10
Commerce and						
Economic	1	1	1	1	1	4
Opportunity						
Corrections	1	1	1	2	2	5
Criminal Justice						
Information	4	4	4	4	4	16
Authority						
Deaf and Hard						
of Hearing	4	4	4	4	4	16
Commission						
Emergency	_	_	_	_	_	
Management	4	4	4	4	4	16
Agency						
Employment	1	2	1	1	2	5
Security						
Environmental						
Protection	2	4	1	2	3	9
Agency						
Executive Ethics	4	4	4	4	4	16
Commission						
Financial and		2	_	2	_	
Professional	1	2	1	2	2	6
Regulation		2				4.1
Gaming Board	4	3	1	3	3	11

BILINGUAL NEED						
Agency	Volume of interactions	Duration of interactions	Frequency of interactions	In-depth interactions	Overall Tier	Total points
Guardianship						
and Advocacy	3	1	2	3	3	9
Commission						
Healthcare and	1	2	1	2	2	6
Family Services	1	2	1	2		U
Historic	4	1	4	1	3	10
Preservation	7	1	7	1	, , , , , , , , , , , , , , , , , , ,	10
Human Rights	1	2	1	4	2	8
Commission	1	2	1	7		0
Human Rights	1	2	1	2	2	6
Department	1		1			U
Human Services	1	2	1	2	2	6
Illinois						
Commerce	1	1	1	1	1	4
Commission						
Innovation and	4	3	4	4	4	15
Technology	4	3	4	4	4	13
Insurance	1	2	1	3	2	7
Investment	4	4	4	4	4	16
Board	4	4	4	4	4	16
Juvenile Justice	1	1	1	2	2	5
Labor	1	1	1	2	2	(
Department	1	1	1	3	2	6
Labor Relations	4	4	4	4	4	1.0
Board	4	4	4	4	4	16
Labor Relations						
Board -	4	4	4	4	4	16
Educational						
Law						
Enforcement						
Training and	4	4	4	4	4	16
Standards						
Board						
Lottery	1	2	1	2	2	6
Military Affairs	4	4	4	4	4	16
Natural	4	2	4	4	2	
Resources	1	3	1	4	3	9
Office of						
Executive	3	2	4	3	4	12
Inspector						

BILINGUAL NEED						
Agency	Volume of interactions	Duration of interactions	Frequency of interactions	In-depth interactions	Overall Tier	Total points
General						
Pollution	4	4	4	4	4	16
Control Board	7	7	7	7		10
Prisoner Review	1	1	2	1	2	5
Board	_	_	-	<b>-</b>	•	,
Procurement	4	4	4	4	4	16
Policy Board	7	7	7	7	-	10
Property Tax	4	4	4	4	4	16
Appeal Board	•				-	
Public Health	1	3	1	1	2	6
Racing Board	4	4	4	4	4	16
Revenue	1	3	1	1	2	6
State Fire	3	3	4	4	4	14
Marshal	3		4	4	7	14
State Police	4	3	4	4	4	15
State Police	4	4	4	4	4	16
Merit Board	4	4	4	4	4	10
State						
Retirement	4	4	4	4	4	16
Systems						
Transportation	2	3	4	4	4	13
Veterans Affairs	1	2	4	3	3	10
Workers						
Compensation	1	3	1	4	3	9
Commission						

# C. Quantifying Agencies' Bilingual Proficiency Through Four Metrics

1. Bilingual Interactions Per Bilingual Staff Member

Tier 1 (High Proficiency): Top quartile.......1 to 34 bilingual interactions per bilingual staff member

Agency	# bilingual interactions per bilingual staff
Arts Council	0
Capital Development Board	0
Civil Service Commission	0
Corrections	-278

Agency	# bilingual interactions per bilingual staff
Criminal Justice Information Authority	0
Deaf and Hard of Hearing Commission	0
Emergency Management Authority	0
Executive Ethics Commission	0
Innovation and Technology	0
Investment Board	0
Labor Relations Board	0
Labor Relations Board – Educational	0
Law Enforcement Training and Standards Board	0
Military Affairs	0
Pollution Control Board	0
Prisoner Review Board	0
Procurement Policy Board	0
Property Tax Appeal Board	0
Racing Board	0
State Police	0
State Police Merit Board	0
State Retirement Systems	0
Children and Family Services	1
Historic Preservation	3
Guardianship and Advocacy Commission	4
Transportation	6
Natural Resources	8
State Fire Marshal	15
Gaming Board	20
Office of Executive Inspector General	24
Environmental Protection Agency	30

Tier 2 (Medium Proficiency): Second quartile......35 to 69 bilingual interactions per bilingual staff member

Agency	# bilingual interactions per bilingual staff
Labor Department	40
Agriculture	60
Workers Compensation Commission	62
Human Rights Commission	67
Employment Security	68

Tier 3 (Low Proficiency): Third quartile......70 to 104 bilingual interactions per bilingual staff member

Agency	# bilingual interactions per bilingual staff
Central Management Services	72
Commerce and Economic Opportunity	97
Human Rights Department	101

Tier 4 (Minimal Proficiency): Fourth quartile .......105 or more bilingual interactions per bilingual staff member

Agency	# bilingual interactions per bilingual staff
Illinois Commerce Commission	141
Veterans Affairs	150
Human Services	150
Juvenile Justice	153
Financial and Professional Regulation	189
Aging	380
Revenue	470
Public Health	604
Insurance	905
Lottery	1,465
Healthcare and Family Services	4,252

#### 2. Compliance with the State Services Assurance Act for FY2008

Tier 1 (High Proficiency): Agency identified in Act and in compliance - or - if agency not identified in Act, assigned Tier 1 (agency's average for other three proficiency metrics)

None of the agencies not identified in the Act were assigned Tier 1 as the average for the other three proficiency metrics.

Agencies Identified in Act and in Compliance						
Agency union staff bilingual staff union					# in excess of SSAA compliance	
Corrections	45	40	85	106	21	
Employment	117	10	127	141	14	

Agencies Identified in Act and in Compliance						
Agency	# bilingual union staff as of June 30, 2007	# additional bilingual union staff required per SSAA	# bilingual union staff should have per SSAA	actual # bilingual union staff as of June 30, 2017	# in excess of SSAA compliance	
Security						
Public Health	12	5	17	25	8	
Juvenile Justice	3	25	28	35	7	

Tier 2 (Medium Proficiency): Assigned Tier 2 (average of other three proficiency metrics)

	Average of Other Three Proficiency Metrics				
Agency	Metric 1 interactions per employee	Metric 3 Notices	Metric 4 Website / Documents	Average of the Three Metrics	
Law Enforcement Training and Standards Board	1	2	3	2	
Arts Council	1	2	4	2	
Capital Development Board	1	2	4	2	
Civil Service Commission	1	2	4	2	
Criminal Justice Information Authority	1	2	4	2	
Deaf and Hard of Hearing Commission	1	2	4	2	
Emergency Management Agency	1	2	4	2	
Executive Ethics Commission	1	2	4	2	
Gaming Board	1	2	4	2	
Historic Preservation	1	2	4	2	
Innovation and Technology	1	2	4	2	
Investment Board	1	2	4	2	
Labor Relations Board	1	2	4	2	
Labor Relations Board - Educational	1	2	4	2	

	Average of Other Three Proficiency Metrics				
Agency	metric 1 interactions Metric 3 per Notices employee		Metric 4 Website / Documents	Average of the Three Metrics	
Military Affairs	1	2	4	2	
Office of Executive Inspector General	1	2	4	2	
Pollution Control Board	1	2	4	2	
Prisoner Review Board	1	2	4	2	
Procurement Policy Board	1	2	4	2	
Property Tax Appeal Board	1	2	4	2	
State Fire Marshal	1	2	4	2	
State Police Merit Board	1	2	4	2	
State Retirement Systems	1	2	4	2	
Transportation	1	2	4	2	
Human Rights Commission	2	2	3	2	
Labor Department	2	2	3	2	
Human Rights Department	3	1	3	2	

Tier 3 (Low Proficiency): Assigned Tier 3 (agency's average of other three proficiency metrics)

	Average of Other Three Proficiency Metrics				
Agency	Metric 1 interactions per employee	Metric 3 Notices	Metric 4 Website / Documents	Average of the Three Metrics	
Agriculture	2	2	4	3	
Workers Compensation Commission	2	2	4	3	
Lottery	4	2	2	3	
Guardianship and Advocacy Commission	1	4	4	3	
Racing Board	1	4	4	3	
Central Management Services	3	2	4	3	

	Average	Average of Other Three Proficiency Metrics				
Agency	Metric 1 interactions per employee	Metric 3 Notices	Metric 4 Website / Documents	Average of the Three Metrics		
Commerce and Economic Opportunity	3	2	4	3		
Financial and Professional Regulation	4	4	1	3		
Healthcare and Family Services	4	1	4	3		
Insurance	4	1	4	3		
Aging	4	2	4	3		
Illinois Commerce Commission	4	2	4	3		

Tier 4 (Minimal Proficiency): Agency identified in Act and not in compliance, or agency not identified in Act, assigned Tier 4 (agency's average of other three proficiency metrics)

Agencies identified Act and not in compliance:

Agency	# bilingual union staff as of June 30, 2007	# additional staff required per SSAA	total # required per SSAA	# bilingual union staff as of June 30, 2017	# less than required
Children and Family Services	154	40	194	167	27
Human Services	1,052	120	1,172	1,148	24
Environmental Protection Agency	14	5	19	10	9
State Police	0	5	5	0	5
Veterans Affairs	1	5	6	1	5
Natural Resources	0	5	5	2	3

Agencies not identified in Act, assigned Tier 4 (agency's average of other three proficiency metrics):

	Average	Average of Other Three Proficiency Metrics				
Agency	Metric 1 interactions per employee	Metric 3 Notices	Metric 4 Website / Documents	Average of the Three Metrics		
Revenue	4	3	4	4		

3. Efforts to Inform the Public of Available Bilingual Services Through Posted Notices

Tier 1 (High Proficiency): Agency posts notices of free bilingual services in conspicuous locations and in its most frequently encountered languages

Agency	Location of notices regarding the availability of bilingual services	Languages in which notices are posted
Children and Family Services	Service desk of all frontline staff	The languages our agency encounters most frequently
Employment Security	One or more of the following: website, facility's public entrances, and frontline staff's service desk	All commonly used languages as provided by the Federal DOL.
Healthcare and Family Services	One or more of the following: website, facility's public entrances, and frontline staff's service desk	The languages our agency encounters most frequently
Human Rights Department	One or more of the following: website, facility's public entrances, and frontline staff's service desk	In the languages the agency encounters and see answer to question #17 which lists the languages that notices are posted on the website.
Human Services	One or more of the following: website, facility's public entrances, and frontline staff's service desk	The languages our agency encounters most frequently
Public Health	One or more of the following: website, facility's public entrances, and frontline staff's service desk	The languages our agency encounters most frequently
One or more of the following: website, State Police facility's public entrances, and frontline staff's service desk		The languages our agency encounters most frequently

Tier 2 (Medium Proficiency): Agency posts notices of free bilingual services in conspicuous locations but not in its most frequently encountered languages

	Location of notices regarding the availability of bilingual services	Languages in which notices are posted	
Agriculture	Agency website	English only	

Tier 3 (Low Proficiency): Agency posts notices of free bilingual services but not in conspicuous locations

Agency	Location of notices regarding the availability of bilingual services	Languages in which notices are posted	
Aging	Assigned Tier 3		
Revenue	Public entrance to JRTC	The languages our agency encounters most frequently	

Tier 4 (Minimal Proficiency): Agency does not post notices of free bilingual services

Agency	Location of notices regarding the availability of bilingual services	Languages in which notices are posted	
Financial and Professional Regulation	Agency does not post notices	Agency does not post notices	
Guardianship and Advocacy Commission	Agency does not post notices	Agency does not post notices	
Racing Board	Agency does not post notices	Agency does not post notices	

4. Efforts to Inform the Public of Available Bilingual Services Through the Agency's Website

Tier 1 (High Proficiency): Agency translates its website into its most frequently encountered languages

Agency	Translated website?	Details
Employment Security	If yes,	Languages Sessions (hits): English 7,005,440 Spanish 29,524 Polish 2,134 Simplified Chinese 2,044 Russian 801
Financial and Professional Regulation	If yes,	Once a specific language is chose, the website resets itself to that language. For questions No. 16 and No. 17, the Department does not possess software that can track website traffic.

Tier 2 (Medium Proficiency): Agency translates part of its website into its most frequently encountered languages

Agency	Translated website?	Details
Children and Family Services	If yes,	Only a few sections are translated into Spanish, not the entire website. 1. Become a foster or adoptive

Agency	Translated website?	Details
		parent online interest form- 804 hits 2. Employment Opportunities in Spanish-16 hits 3. Forms- Spanish-3,259 hits 4. Policy Guide-Spanish- 46 hits 5. Rules-Spanish- 298 hits
Human Services	If yes,	Yes. IDHS' website provides an En Español link, which translates the main page of the website into Spanish. This link is located at http://www.dhs.state.il.us/page.aspx?item=70728
Lottery	If yes,	Spanish - 29,122 Hits

Tier 3 (Low Proficiency): Agency does not translate its website but posts documents translated into its most frequently encountered languages

Agency	Translated website?	Details
Healthcare and Family Services	If yes,	HFS does not translate its website into other languages, but leave it to the consumers of the content to utilize readily available translation tools to translate the content into the language of their choice.
Human Rights Department	If yes,	The website is not translated into any other languages, however, different documents and brochures are found on the website in 16 different languages. These are brochures on various topics covered by the Department. The topics (with the language in which it is translated in parenthesis) are: Filing a Charge of Discrimination (Arabic, Bosnian, Chinese, French, German, Hindi, Italian, Japanese, Korean, Polish, Russian, Spanish, Tagalog, Urdu and Vietnamese); Guide for Respondents (Greek, Korean and Spanish); Fair Housing Guide (Chinese, French, Polish and Spanish); Bidder's Guide (Spanish); Mediation (Spanish); Financial Credit (Spanish); and Pregnancy Notice (Spanish). There are still other documents and informational notices translated in Spanish dealing with sexual harassment and employment discrimination.
Labor Department	If yes,	Forms can be downloaded in languages other than English from the website but the website is in English.
Human Rights Commission	If yes,	n/a

Agency	Translated website?	Details
Law Enforcement Training and Standards Board	If yes,	n/a
Public Health	If yes,	The agency's website is not translated into other languages, however, there is a link to a comprehensive list of translated resource documents on our Center for Minority Health homepage.

Tier 4 (Minimal Proficiency): Agency does not translate its website or post translated documents

Agency	Translated website?	Details
Aging	No	
Agriculture	No	
Arts Council	No	
Capital Development Board	No	
Central Management Services	No	
Civil Service Commission	No	
Commerce and Economic Opportunity	No	
Corrections	No	
Criminal Justice Information Authority	No	
Deaf and Hard of Hearing Commission	No	
Emergency Management Agency	No	
Environmental Protection Agency	No	
Executive Ethics Commission	No	
Gaming Board	No	
Guardianship and Advocacy Commission	If yes,	Google Translate provides translation for 100+ languages
Healthcare and Family Services	If yes,	HFS does not translate its website into other languages, but leave it to the consumers of the content to utilize readily available translation tools to translate the content into the language of their choice.

Agency	Translated website?	Details
Historic Preservation	No	
Illinois Commerce Commission	No	
Innovation and Technology	No	
Insurance	No	
Investment Board	No	
Juvenile Justice	No	
Labor Relations Board	No	
Labor Relations Board - Educational	No	
Military Affairs	No	
Natural Resources	No	
Office of Executive Inspector General	No	
Pollution Control Board	No	
Prisoner Review Board	No	
Procurement Policy Board	No	
Property Tax Appeal Board	No	
Racing Board	No	
Revenue	No	
State Fire Marshal	No	
State Police	No	
State Police Merit Board	No	
State Retirement Systems	No	
Transportation	No	
Veterans Affairs	No	
Workers Compensation Commission	No	

## E. Calculating Agencies' Overall Bilingual Proficiency Tier

Below is a chart of the agencies' scores on each of the metrics listed above to assess proficiency to meet bilingual need, along with the total points and overall Tier.

BIILINGUAL PROFICIENCY						
Agency	interaction s per EE	SSAA Complianc e	Notices	Website / Documents	Total Points	Overall Tier
Aging	4	1	1	1	7	2
Agriculture	2	1	2	1	6	2
Arts Council	1	1	1	1	4	1
Capital Development	1	1	1	1	4	1

BIILINGUAL PROFICIENCY						
Agency	interaction s per EE	SSAA Complianc e	Notices	Website / Documents	Total Points	Overall Tier
Board						
Central						
Management	3	1	1	1	6	2
Services						
Children and	1	3	1	2	7	2
Family Services	1	3	1	2	,	2
Civil Service	1	1	1	1	4	1
Commission	1	1	1	1	4	-
Commerce and						
Economic	3	1	1	1	6	2
Opportunity						
Corrections	1	1	1	1	4	1
Criminal Justice						
Information	1	1	1	1	4	1
Authority						
Deaf and Hard						
of Hearing	1	1	1	1	4	1
Commission						
Emergency						
Management	1	1	1	1	4	1
Agency						
Employment	2	1	1	1	5	2
Security	_	_	_	_	, , , , , , , , , , , , , , , , , , ,	_
Environmental						
Protection	1	3	1	1	6	2
Agency						
Executive Ethics	1	1	1	1	4	1
Commission						
Financial and	_	_	_	_		_
Professional	4	1	4	1	10	4
Regulation	_	_		_	_	_
Gaming Board	1	1	1	1	4	1
Guardianship	_	_	_	_	_	
and Advocacy	1	1	4	1	7	2
Commission						
Healthcare and	4	1	1	3	9	3
Family Services						
Historic	1	1	1	1	4	1
Preservation	_	_	_	_	•	_

BIILINGUAL PROFICIENCY						
Agency	interaction s per EE	SSAA Complianc e	Notices	Website / Documents	Total Points	Overall Tier
Human Rights	2	1	1	3	7	2
Commission						
Human Rights	3	1	1	3	8	3
Department						_
Human Services	4	3	1	2	10	4
Illinois Commerce Commission	4	1	1	1	7	2
Innovation and Technology	1	1	1	1	4	1
Insurance	4	1	1	1	7	2
Investment Board	1	1	1	1	4	1
Juvenile Justice	4	1	1	3	9	3
Labor Department	2	1	1	3	7	2
Labor Relations Board	1	1	1	1	4	1
Labor Relations Board - Educational	1	1	1	1	4	1
Law Enforcement Training and Standards Board	1	1	1	1	4	1
Lottery	4	1	1	2	8	3
Military Affairs	1	1	1	1	4	1
Natural Resources	1	3	1	1	6	2
Office of Executive Inspector General	1	1	1	1	4	1
Pollution Control Board	1	1	1	1	4	1
Prisoner Review Board	1	1	1	1	4	1
Procurement Policy Board	1	1	1	1	4	1

BIILINGUAL PROFICIENCY						
Agency	interaction s per EE	SSAA Complianc e	Notices	Website / Documents	Total Points	Overall Tier
Property Tax Appeal Board	1	1	1	1	4	1
Public Health	4	1	1	3	9	3
Racing Board	1	1	4	1	7	2
Revenue	4	1	3	1	9	3
State Fire Marshal	1	1	1	1	4	1
State Police	1	3	1	1	6	2
State Police Merit Board	1	1	1	1	4	1
State Retirement Systems	1	1	1	1	4	1
Transportation	1	1	1	1	4	1
Veterans Affairs	4	3	1	1	9	3
Workers Compensation Commission	2	1	1	1	5	2

## F. Agency Letter Codes for Bilingual Needs/Bilingual Proficiency Matrix

Each agency is listed in the chart below along with its overall Tier for bilingual need, overall Tier for bilingual proficiency, and Matrix Code.

Agency Matrix Codes				
Agency	Bilingual Need Tier	Bilingual Proficiency Tier	Matrix Code	
Aging	1	2	Α	
Agriculture	2	2	Н	
Arts Council	4	1	М	
Capital Development Board	4	1	M	
Central Management Services	2	2	Н	
Children and Family Services	1	2	Α	
Civil Service Commission	4	1	M	
Commerce and Economic Opportunity	1	2	Α	
Corrections	2	1	K	
Criminal Justice Information Authority	4	1	М	

Agency Matrix Codes				
Agency	Bilingual Need Tier	Bilingual Proficiency Tier	Matrix Code	
Deaf and Hard of Hearing Commission	4	1	M	
Emergency Management Agency	4	1	M	
Employment Security	2	2	Н	
Environmental Protection Agency	3	2	N	
Executive Ethics Commission	4	1	M	
Financial and Professional Regulation	2	4	Е	
Gaming Board	3	1	L	
Guardianship and Advocacy Commission	3	2	N	
Healthcare and Family Services	2	3	С	
Historic Preservation	3	1	L	
Human Rights Commission	3	2	N	
Human Rights Department	2	3	С	
Human Services	2	4	Е	
Illinois Commerce Commission	1	2	Α	
Innovation and Technology	4	1	М	
Insurance	2	2	Н	
Investment Board	4	1	М	
Juvenile Justice	2	3	С	
Labor Department	2	2	Н	
Labor Relations Board	4	1	М	
Labor Relations Board - Educational	4	1	М	
Law Enforcement Training and Standards Board	4	1	М	
Lottery	2	3	С	
Military Affairs	4	1	М	
Natural Resources	3	2	N	
Office of Executive Inspector General	4	1	М	
Pollution Control Board	4	1	М	
Prisoner Review Board	2	1	K	
Procurement Policy Board	4	1	М	
Property Tax Appeal Board	4	1	М	
Public Health	2	3	С	
Racing Board	4	2	0	
Revenue	2	3	С	
State Fire Marshal	4	1	М	
State Police	4	2	0	
State Police Merit Board	4	1	М	
State Retirement Systems	4	1	M	

Agency Matrix Codes				
Agency	Bilingual Need Tier	Bilingual Proficiency Tier	Matrix Code	
Transportation	4	1	М	
Veterans Affairs	3	3	1	
Workers Compensation Commission	3	2	N	

