



Governor's Office of Management and Budget Language Access Plan May 2025

General Policy Statement

It is the policy of the Governor's Office of Management and Budget ("GOMB" or "the agency" or "the office") that GOMB personnel shall take reasonable steps to provide timely, meaningful access to all publicly available information, programs, or activities for Limited English Proficiency ("LEP") persons. This policy is based on the principle that it is the responsibility of the agency, not the LEP person, to take reasonable steps to ensure that communications between GOMB and the public are as consistent as possible. GOMB personnel will inform members of the public that language assistance services are available free of charge to LEP persons and that the office will provide these services to them.

Purpose and Authority

The purpose of this plan is to ensure that persons who have limited English proficiency have equitable access to GOMB information, programs, services, and activities by eliminating or reducing limited English proficiency as a barrier in accordance with the Language Equity and Access Act (*See 15 ILCS 56/1, et. seq.*) It is necessary for GOMB personnel to make reasonable efforts to provide timely language assistance services to ensure that LEP persons have substantially equal and meaningfully effective access to the information and services GOMB provides.

This plan is intended only to improve the internal management of GOMB and does not create any right or benefit, substantive or procedural, enforceable at law or equity by a party against the office. Administration of the initiatives discussed herein is within the sole discretion of the Director of GOMB and in accordance with the Language Equity and Access Act.

Definitions

Effective Communication - Communication sufficient to provide the LEP individual with substantially the same level of services received by individuals fully proficient in the English language.

Interpretation - The act of listening to a communication in one language and orally converting it to another language in a manner that preserves the intent and meaning of the original message.

Language Assistance Services - Oral and written language services needed to assist LEP persons to communicate effectively with staff, and to provide LEP persons with meaningful access to, and an equal opportunity to participate fully in, the agency's services, activities, or other programs.

Limited English Proficient ("LEP") - Persons whose primary language is not English and who have a limited ability to read, write, speak, or understand English.

Meaningful Access - Language assistance that results in accurate, timely, and effective communication for the LEP person. Meaningful access denotes access that is not unreasonably restricted, delayed, or inferior as compared to access to programs or activities provided to English proficient individuals.

Primary Language - The language in which the individual most effectively communicates.

Program or Activity - The terms “program,” “activity,” and “program or activity” mean all of the operations of the agency.

Translation - The conversion of text from one language to another in a written form to convey the intent and essential meaning of the original text.

Vital Document – Paper or electronic written material that contains information that affects a person’s access to, retention of, termination of, or exclusion from program services or benefits or is required by law.

Plan Development and Implementation

Committee

GOMB will establish a Language Access Committee which will be led by the Language Access Coordinator. The Committee will consist of at least four members, including individuals from Operations, the Legal team, and the Grant Accountability and Transparency Unit (“GATU”). The Committee should also include at least one bilingual speaker, if practical. The Committee will have a number of responsibilities, including 1) assessing the office’s programs and activities for LEP needs, 2) updating the Language Access Plan on an annual basis, 3) monitoring and evaluating the office’s progress and effectiveness in meeting the goals set forth herein, and 4) locating resources and establishing effective practices for addressing translation, interpretation, and other critical language access issues.

Language Access Coordinator

The Language Access Coordinator will oversee the implementation of the plan, manage requests for interpretation or translation, manage the office’s budget for language assistance services, and conduct or delegate responsibilities for training developed by the Committee on how to utilize language assistance services when interacting with members of the public.

Language Access Coordinator:

Jennifer Cavanaugh, Deputy Director of Operations

Email: GOMB@illinois.gov

Plan Implementation

The Committee will meet periodically, but no less than annually, to review the effectiveness of the plan, draft revisions where necessary, and lead office-wide language access initiatives. Implementation of the plan will include distribution of the plan to all supervisors and formalized training for personnel, if needed; stakeholder consultation; adoption of effective methods for providing language assistance services; and notifying stakeholders about the availability of language assistance services through the agency’s website.

Staff Training

All GOMB personnel will receive training on the Language Access Plan (LAP) and language access obligations as part of new employee onboarding. Refresher training will be provided annually to ensure continued understanding and compliance.

Training will include:

- Overview of the Language Equity and Access Act and GOMB's responsibilities.
- How to identify Limited English Proficient (LEP) individuals and access interpreter/translation services.
- Procedures for logging and escalating LEP requests.
- Use of available translation tools on the GOMB website.

Training will also include a review of the **Language Access Complaint Form** and procedures for assisting members of the public in submitting a complaint related to language access services. Staff will be expected to understand when and how to provide the form and where to direct completed submissions.

The Language Access Coordinator (LAC) will track participation and incorporate training completion into annual compliance reporting. Supervisors will ensure all staff participate in scheduled sessions.

Identification and Assessment of LEP Communities

Office Interaction with Members of the Public and LEP persons

Primary Responsibilities

The office's statutory responsibilities consist of preparing the Governor's annual budget and advising the Governor on the availability of revenues and the allocation of those resources to office programs. The office also manages the issuance of State debt and the State's capital program, analyzes State agency programs and budgets, and evaluates personnel and operating needs. The majority of the individuals with which office personnel interact to perform these functions work elsewhere in State government and language assistance services are not needed.

Members of the public can access the Governor's annual proposed budget (the "Budget Book"), several statutorily required reports, and other resources related to the agency's activities on the GOMB website.¹ The office currently does not collect data to determine the number of LEP persons who access this information or the languages those individuals speak.

Grant Accountability and Transparency Unit

The GOMB Grant Accountability and Transparency Unit ("GATU") manages and directs compliance with the Grant Accountability and Transparency Act and with federal Uniform Guidance (2 CFR 200). GATU interacts with members of the public in a number of ways, including but not limited to:

- Grant-related web-based trainings on the GOMB public website,

¹ <https://budget.illinois.gov/>

- A Resource Library on the GOMB public website which includes a number of documents, virtual trainings, and links to information which will assist grantees in complying with federal and state grant requirements,
- Direct responses to inquiries via email to OMB.GATA@illinois.gov,
- A grantee portal, which provides access to interactive computer programs that offer indirect cost rate negotiation services, grant management and GATA compliance training, access to notice of funding opportunities (NOFOs), and other grant related functions, and
- The distribution of and participation in the drafting of the Uniform Grant Agreement.

GATU's interactions with the public typically occur via various online portals and rarely in person. Currently, none of the online portals collect demographic information such that GOMB is able to track access by LEP populations. The unit does not have a mechanism with which to collect data from stakeholders about their satisfaction with GATU's programs and activities.

Commissions

GOMB's Budgeting for Results ("BFR") Unit is responsible for assisting and guiding the Budgeting for Results Commission. The office facilitates Commission meetings and posts public notices of the meetings and several documents related to the Commissions' work for public review, including but not limited to the Budgeting for Results Transparency Report, the Illinois Horizontal Capital Budget Report, and the Budgeting for Results Commission Report,. The office currently does not collect data to determine the number of LEP persons who access this information or the languages those individuals speak.

Identification and Assessment of LEP Communities

In 2025, the Governor's Office of Management and Budget relied on demographic analysis conducted by the University of Illinois Chicago in partnership with the Office of New Americans regarding individuals with limited English proficiency (LEP) in Illinois. This analysis indicates that approximately 1.0 million Illinois residents speak English less than "very well" and speak a language other than English at home.

Statewide, at least eleven languages have more than 10,000 limited English speakers, reflecting the linguistic diversity of Illinois residents. While Spanish is the predominant non-English language spoken in many counties, LEP populations speak a wide range of languages across the State. The geographic distribution of LEP individuals is concentrated in the metropolitan Chicago area, with additional notable populations in regions near St. Louis, Springfield, Champaign, and Rock Island, as well as in some rural townships.

Recent data also indicates that, after several years of decline, the LEP population in Illinois is increasing. Following a low of approximately 1.0 million LEP residents in 2019, the number rose to approximately 1.08 million residents in 2023, reflecting a growing need for language access planning and services statewide.

Although GOMB does not routinely collect demographic or language preference data from users of its public-facing systems, this statewide LEP data informs the agency's approach to language access planning, prioritization of translation and interpretation services, and ongoing evaluation of language access needs.

The majority of the population with which GOMB employees interact for development and advisory roles are proficient in English. Other interactions with the public occur primarily through GOMB's public website, the grantee portal, and public commission meetings. In the past, the office has not taken steps to gather demographic information to determine how many visitors to the GOMB public website,

grantees, potential grantees, and members of the public interested in the work of the BFR Commission count themselves among the millions of individuals for whom English is not their primary language.

At this time, GOMB does not believe it is necessary to gather demographic information regarding the English proficiency of visitors to its public website. The public website contains a translation widget, capable of translating the website contents to over 100 languages giving LEP persons meaningful access to the site's content. LEP individuals who speak languages other than those offered by the translation widget will have the opportunity to request language access services through the Language Access Coordinator. Because the office is able to provide meaningful access to a wide range of LEP individuals with a simple, cost-effective solution, a data gathering campaign is not required.

The office believes that demographic information about grantees and potential grantees would be valuable both for the State agencies it serves and for the development of future trainings. GOMB, through its Deputy Director of Information and Technology ("IT") and its IT Manager will consult with the Department of Innovation and Technology ("DoIT") and the Governor's Office to determine how it can add demographic data collection to the login page of the grantee portal. Currently, in order to create an account, grantees are required to provide basic contact information. The office will explore the feasibility of collecting demographic information as an optional registration field.

As for public commission meetings, the Language Access Coordinator will work with the Director of the Budgeting for Results Unit to ensure "I Speak" language identification cards² are provided to and collected from members of the public who attend Commission meetings. The Language Access Coordinator will also ensure that Commissioners and GOMB personnel who attend meetings are instructed to identify LEP persons, verify LEP persons' primary language, and notify the Language Access Coordinator if/when an LEP individual needs accommodation.

In the future, GOMB will ensure that any newly developed computer system or program will have the capability to collect demographic information about system users.

Language Assistance Services

GOMB will take reasonable steps to ensure LEP persons can access its public website, documents posted on the public website, the grant management system, and Commission-related documents.

Translation of Vital Documents

GOMB will prioritize the translation of vital documents. Classification of a document as "vital" depends on the importance of the program or service the document involves, whether the document is statutorily required, and the consequences to an LEP person if the information is not translated into the person's primary language. The determination of what documents are "vital" is left to the discretion of the Language Access Coordinator.

The vital documents currently posted on the GOMB public website include, but are not limited to the following:

² An example of such a card from the U.S. Census Bureau is available at: <http://www.justice.gov/crt/lep/resources/ISpeakCards2004.pdf>.

1. Current Fiscal Year Budget Book
2. Economic and Fiscal Policy Reports for the Current Fiscal Year
3. Budgeting for Results Transparency Report
4. Budgeting for Results Commission Report
5. Current Budgeting for Results Commission Meeting Notices
6. Current Fiscal Year General Obligation Bond Series Official Statement
7. Current Fiscal Year General Obligation Bond Series Preliminary Official Statement
8. Any other statutorily required reports

The Language Access Coordinator will collaborate with the Director of GATU to determine what information on the Grant Accountability and Transparency Act homepage³ should be considered vital documents.

The Language Access Coordinator will evaluate each vital document to determine how to ensure meaningful access for LEP persons, considering cost, efficiency, and potential accuracy of a translation method.

The office utilizes the state's translation tool, which is accessible to the Language Access Coordinator, a designated GATU member, and our bilingual (Spanish-speaking) staff member who assists in verifying translated documents for accuracy.

Currently, the majority of the resources on the GOMB website, including but not limited to the Budget Book, documents in the GATU Resource Library, and documents related to the BFR Commission, have been uploaded to the site in a .pdf format. Because Google Translate can only process documents up to 10MB in size, some documents on the GOMB public website like the Budget Book are too large for Google Translate to process. For these documents, the Language Access Coordinator will take one of the following steps to ensure the documents can be translated: 1) convert .pdf documents into .html format or 2) determine how to divide the documents into smaller documents that are less than 10MB.

If it is determined that Google Translate will not provide the necessary language assistance services, the Language Access Coordinator will also explore the use of Babel notices to inform LEP persons that a specific vital document can be translated upon request. The Language Access Coordinator will collaborate with the Language Access Committee to establish a procedure whereby an LEP individual can request free translation services for a specific document.

As new vital documents are posted to the site, the Language Access Coordinator will ensure that they are posted on the GOMB website in .html format.

Translation Prioritization and Languages

Vital documents will be translated at minimum into Spanish, with additional languages added as needed based on demand or data from the grantee portal. The LAC will annually review whether additional languages should be prioritized (e.g., Polish, Chinese, Arabic, Tagalog).

Written Correspondence Protocol

³ <https://gata.illinois.gov/resources.html>

If GOMB receives written correspondence in a language other than English:

1. Staff forward it to the LAC within two business days.
2. The LAC arranges translation using internal bilingual staff or approved vendors.
3. A translated response is sent back in both English and the original language.
4. The request and response are logged for monitoring.

Grantee Portal

The office's primary interaction with the public occurs through the Grantee Portal, a page designed to be the single source of centralized information related to grant management.

Once logged in, grantees can navigate to the Audit Report Review Management System ("ARRMS"), the Indirect Cost Rate Election System, and the AmpliFund statewide grant management system. ARRMS and the Indirect Cost Rate Election System were created and are maintained by the GOMB IT Manager; thus, the Language Access Coordinator will collaborate with the IT Manager Internally to provide meaningful translation services on those pages.

AmpliFund is provided by a third-party vendor and does not currently provide language assistance services. The Language Access Coordinator will work with the Deputy Director of Accountability and Results and AmpliFund to determine how to make adjustments to the AmpliFund software so translations of the information on the site are available.

Professional Interpreter Services

GOMB facilitates public meetings of the and the Budgeting for Results Commission. Upon request to the Language Access Coordinator, GOMB may engage professional services to ensure effective communication with LEP persons who chose to participate as observers during these meetings. GOMB may use in-person, over-the-phone, or video interpretation services. For non-routine requests, the LAC will coordinate vendor engagement at least 48 hours prior to meetings or hearings when possible.

Recording Language Preferences

When LEP individuals request assistance through GOMB's public-facing channels (e.g., OMB.GATA@illinois.gov, commission meetings, or public inquiries), staff will document the request in a **Language Access Log**. The log will capture the request date, language, type of service (interpretation or translation), and outcome. This data will support annual performance review and compliance reporting.

Notification of the Availability of Language Assistance Service

GOMB will take reasonable steps to notify the public about language assistance services including, but not limited to, ensuring this plan is made publicly available.

In order to ensure members of the public are aware of the availability of translation services for public commission meetings, GOMB will include a note in public meeting notices informing the public of the availability of interpretation services during meetings or translation services of meeting agendas, minutes, etc.

Public notices about language assistance services will be posted in English and Spanish on the GOMB website, meeting announcements, and relevant publications.

GOMB will also:

- Add a notice in Spanish to the Budget Book landing page.
- Include a statement in public meeting notices explaining how LEP individuals can request interpretation.
- Incorporate language access information in annual grantee training webinars and communications to agency partners.

Monitoring and Evaluation

Complaint Resolution Procedure

GOMB provides a clear and transparent process for addressing concerns related to language access:

1. **Submission:** LEP individuals or their representatives may submit complaints by email to GOMB.@illinois.gov or in writing to the Language Access Coordinator (LAC), Jennifer Cavanaugh.
2. **Acknowledgment:** The LAC will acknowledge receipt within five business days and log the complaint in the Language Access Log.
3. **Review:** The LAC and appropriate program area will review and determine necessary corrective action within fifteen business days.
4. **Resolution and Escalation:** If unresolved, the matter is elevated to the GOMB Director for review. Any unresolved complaints after Director review will be referred to the Office of New Americans at GOV.NewAmericans@illinois.gov.
5. **Tracking:** Complaint outcomes and resolution timelines will be recorded and summarized annually.

Monitoring and Plan Evaluation

GOMB will monitor and evaluate the effectiveness of its Language Access Plan through the following actions:

- The Language Access Committee will review the Language Access Log annually to assess service requests, translation timeliness, training completion, and complaint patterns.
- The LAC will prepare an Annual Language Access Summary Report for internal review by senior leadership.
- Findings will inform updates to staff training, translation priorities, and any resource reallocations.
- The LAP will be updated at least annually to incorporate lessons learned, demographic trends, and feedback from the Office of New Americans.