

ILLINOIS PROPERTY TAX APPEAL BOARD LANGUAGE ACCESS PLAN



LANGUAGE ACCESS PLAN: ENSURING EQUITABLE ACCESS FOR ALL

Including Services for Limited English Proficient
and Sensory-Impaired Individuals





State of Illinois PROPERTY TAX APPEAL BOARD

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Language Access Plan

I. Introduction

The Illinois Property Tax Appeal Board (PTAB or Board) Language Access Plan (PLAN), establishes evidence-based policies, procedures and guidelines to ensure meaningful access to agency services, programs, and activities on the part of non-English speakers (“NES”) and persons who have limited English proficiency (LEP), as defined below.

PTAB Executive Director coordinates the appointment of a Language Access Coordinator (Coordinator). The Coordinator is responsible for administration and monitoring of the Department’s Language Access Plan and initiatives, including LEP policies, procedures, guidelines, and performance. The Coordinator is responsible for developing partnerships with LEP stakeholders for outreach initiatives, other activities, and day-to-day PLAN matters. The Coordinator will oversee the process for reviewing and, if appropriate, modifying or updating the PLAN. The Coordinator is responsible for issuing annual reports, regarding, but not limited, to PLAN data and execution. When a vacancy occurs in the position of Language Access Coordinator, the Executive Director will immediately appoint a temporary or replacement coordinator.

The Property Tax Appeal Board (PTAB or Board) is a quasi-judicial body providing taxpayers and taxing districts an unbiased forum to contest a property's property tax assessment. The Board consists of five Board Members appointed by the Governor, with the advice and consent of the Senate, and a professional staff that aids the Board in its mission. The Board's jurisdiction is limited to only adjudicating the correct assessment of a property based on equity and the weight of the evidence. The Board does not have jurisdiction to review the amount of a tax bill, or the tax rate used in the tax bill's computation. Likewise, the Board has no authority to exempt property from taxation.

Ethical Constraints – As an administrative body, ethical rules severely restrict the PTAB’s ability to communicate with appellants, respondents, and intervenors. Nothing in this PLAN should be interpreted as a suggestion or invitation to violate those ethical constraints. PTAB’s staff and any interpreter or interpreting service provided by PTAB are prohibited from giving legal advice to any individual needing translating or interpreting services. PTAB staff and any interpreter provided by PTAB are prohibited from commenting on the quality or quantity of evidence submitted by a party or comment on the veracity of any legal argument put forth by any

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party. PTAB's staff must comply with all restrictions on *ex parte* communications even when using an interpreter.

II. PLAN Objectives

This PLAN establishes guidelines and procedures for providing services to persons with LEP. The policy of the PTAB, following Title VI of the Civil Rights Act of 1964 [42 U.S.C. 2000], prohibits national origin discrimination as it affects persons with LEP.

A person with LEP cannot speak, read, write, or understand the English language at a level that allows effective interaction with the PTAB, as well as understand, or take full advantage of PTAB's programs and services in English. A person with LEP requires interpretation or translation services to have meaningful access to PTAB's programs and services. Under no circumstances will services to an individual be denied or unnecessarily delayed because of the individual's limited English proficiency. An individual maintains the right to self-identify as an LEP person and indicate their language of preference, particularly concerning PTAB's services.

This PLAN guides PTAB's staff in eliminating language access barriers that can stand in the way of Illinois residents full and equitable access to PTAB's services, programs, and activities. The guidelines herein contain mandatory procedures to ensure proper and consistent language access. All language access activities undertaken by any division or program within PTAB shall conform to this PLAN. This PLAN will update to ensure continued responsiveness to community needs and compliance with applicable legal requirements.

The PLAN shall be fully implemented subject to the availability of fiscal resources. The PLAN represents the administrative blueprint and general procedures for providing meaningful access to LEP individuals seeking to utilize PTAB's services. This PLAN outlines the tasks PTAB has undertaken and will undertake to meet this objective.

The PLAN applies to all PTAB staff, with emphasis on those who interact with the public. Interaction includes in-person, virtual, and phone communication. Adherence to this PLAN will ensure that individuals with LEP and those visually or hearing impaired are informed and receive interpretation services at no cost.

A. Language Access Needs Assessment

Illinois is a highly diverse state in which numerous LEP households reside. According to U.S. Census Bureau data from the American Community Survey (ACS) for the years 2009-2013,¹ 22.3% of all residents over five speak a language other than English, and 9.4% speak English less than "very well."

¹ This is the most recent data available at <https://www.census.gov/topics/population/language-use/data.html> as of May 4, 2021.

According to U.S. Census data, the most frequently spoken languages among the LEP population in Illinois are Spanish, Polish, Russian, Chinese (including Mandarin and Cantonese), Korean, Tagalog, and Arabic.

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

<i>Population</i>	<i>Number</i>	<i>% of Total</i>
<i>Population 5 years and over</i>	<i>12,027,783</i>	<i>100.00%</i>
<i>Speak only English</i>	<i>9,342,837</i>	<i>77.68%</i>
<i>Speak a language other than English</i>	<i>2,684,946</i>	<i>22.32%</i>
<i>Speak English less than "Very Well"</i>	<i>1,131,389</i>	<i>9.41%</i>
<i>Spanish or Spanish Creole*</i>	<i>704,908</i>	<i>5.86%</i>
<i>Italian*</i>	<i>11,450</i>	<i>0.10%</i>
<i>Russian*</i>	<i>19,575</i>	<i>0.16%</i>
<i>Polish*</i>	<i>91,438</i>	<i>0.76%</i>
<i>Hindi*</i>	<i>9,678</i>	<i>0.08%</i>
<i>Gujarati*</i>	<i>17,653</i>	<i>0.15%</i>
<i>Urdu*</i>	<i>11,901</i>	<i>0.10%</i>
<i>Chinese (incl. Cantonese, Mandarin, other)*</i>	<i>50,122</i>	<i>0.42%</i>
<i>Korean*</i>	<i>27,057</i>	<i>0.22%</i>
<i>Vietnamese*</i>	<i>12,489</i>	<i>0.10%</i>
<i>Tagalog*</i>	<i>22,988</i>	<i>0.19%</i>
<i>Arabic*</i>	<i>18,865</i>	<i>0.16%</i>
*Includes persons who speak this language and speak English less than “Very Well.” These numbers likely overstate the LEP population because they include persons who self-assess their ability to speak English as "Well."		

While day-to-day direct contacts between LEP individuals and PTAB are limited, occasional direct communications between the PTAB and LEP constituencies may occur in a variety of contexts. These contexts include incoming telephone calls, emails, PTAB’s petitions, public facing website, Webex virtual hearings, and publication of materials in accordance with the Open Meetings Act.

Through a survey, PTAB learned the language constituents most often need assistance with is Spanish. PTAB has a fluent Spanish-speaking employee who is available via a dedicated PTAB cell phone for Spanish-speaking constituents. Spanish Dedicated Cell: 773-805-2994

B. Data Collection and Analysis

PTAB data collection efforts include both short and long-term goals and objectives. PTAB has a lack of historical data, so work will be done to establish baseline data points and train associated staff to track information. Furthermore, PTAB will utilize evidence-based policies, procedures, and guidelines to coordinate efforts to develop standardized data collection and annual data collection training. The Coordinator will lead efforts to analyze LEP data and develop and implement action items.

Short-Term Goals: Standardized data collection guidelines to assess the number and percentage of persons with LEP who need PTAB PLAN services. Pursuant to PLAN training, all PTAB employees encounters with LEP individuals, the delivery of language assistance by bilingual staff or interpreters will be forwarded to Phyllis G. McJunkins (phyllis.mcjunkins@illinois.gov; 217.558.5132) for inclusion in an Excel Spreadsheet.

Long-Term Goals: Once baseline data is collected, the Coordinator will review the number and types of languages services requested and utilized to identify the greatest needs and any common issues in implementation as to offer improvements and solutions. The Coordinator will also review data to justify updating operating systems to allow for either the automatic collection of claimant's language preference, or the ability for a claimant to self-identify language access preferences, to allow for the ability to issue documents and other communications automatically in the claimant's preferred language.

C. Community Outreach and Public Notice

The Coordinator will work with PTAB internal information specialists as well as DoIT on the creation and implementation of outreach efforts, including but not limited to the highlighting of the existing LEP services free of charge at www.ptab.illinois.gov. Currently available to the public on PTAB's website home page are tabs to translate the entire web application into six additional languages, as well as a link to request interpretation services. This request form includes check boxes for the type of interpretation needed, the ability to select one of six other languages, including American Sign Language, as well as the option to select "other" and specify services or languages needed.

A language identification sign in languages commonly used by individuals with LEP, instructing individuals with LEP to point to their language and announcing the availability of free interpretation services, can be visibly posted at the entrance of the PTAB main off in Springfield and Chicago. Telephone numbers to file a complaint if an individual believes they have been discriminated against shall also be posted. The number to contact the PTAB EEO is (217) 557-0122. Additionally, a language card for LEP individuals, such as an "I Speak" flashcard written in different languages, including braille, can be utilized to help communicate.

PTAB understands and welcomes the responsibility to inform the public about LEP services. PTAB's Coordinator will work collaboratively with DoIT, CMS, and internal information stakeholders to ensure that all PTAB office locations, it's website, web-based applications and public meetings adequately advertise and support LEP services. Such outreach initiatives will be reviewed annually.

III. Language Access Procedures

PTAB's language assistance services and protocols include the following:

- Bilingual staff
- Oral interpretation services

- Interpreters/Bilingual Staff
- Telephone interpreter lines
- American Sign Language interpretation
- Teletype Device (TTY)/Telecommunication Device for Deaf (TDD)
- Written language translation

Bilingual Staff

Two PTAB employees have been identified as fluent in languages other than English, i.e., Spanish and Greek. PTAB staff are not currently compensated for their bilingual skills.

Interpretation

Interpretation services include telephonic and face-to-face interpretation, as well as sign-language interpretation. An Illinois state master contract for procuring interpretation services exists for all agencies, including PTAB.

Per the state master contract, Propio Language Services provides three-way phone interpretation. Per the state master contract, Multilingual Connections provides interpretation services at public meetings/hearings, legal meetings/hearings, and other legal proceedings, conferences, workshops, training sessions, and other direct person-to-person interactions. Requests for interpretation services from Multilingual Connections can be made by completing a Contractual Services Request Form (CSR), obtaining the Executive Director's approval signature, and sending an email to Danny Sronce at daniel.sronce2@illinois.gov. Requests should be made at least 1-2 weeks in advance.

The Coordinator will ensure proper management and administration of these two contracts. The Coordinator will work to identify and may designate points of contact from units that will likely use the services under these two contracts.

Interpreters or Bilingual Staff

- PTAB must provide interpreters or bilingual staff for LEP individuals seeking PTAB services.
- An individual with LEP may provide an interpreter of their own choosing at their own expense, but not during an administrative hearing, unless approved by the presiding administrative law judge. Extra caution should be exercised when the LEP person chooses a minor as the interpreter. While PTAB will respect an individual's choice of interpreter with LEP, there may be issues of competency, confidentiality, or conflict of interest when the choice involves using some individuals as interpreters.
- The interpreter can be used as a supplement to the interpreter services provided by PTAB.
- Secondary Sources of Interpreters: If no available PTAB staff can serve as interpreters, the contracted vendor for such services will be contacted. Additionally, PTAB may utilize court reporter services that provide interpreter services in Cook County.

Telephonic Interpretation

Telephonic Interpreter Services (TIS) are available for all in-person and telephone contact with the public. Suppose a member of the public visits or calls PTAB and does not speak English or Spanish. In that case, Propio Language Services will be contacted for interpretation services by taking the following steps.

Using Telephone Interpretation Line

1. Dial: 1-866-828-3280
2. When prompted
 - For a Spanish interpreter
Press 1
 - For all other languages
Press 2
Enter the 2-digit language code (see Language Interpretation Directions, attached)

3. Enter the 5-digit account#: 10002

4. Provide to agent:

Caller's first name and initial of last name and work number with area code

For 3-way calls:

Ask the first person who answers (interpreter or call coordinator) to place the call.

Back-Up Interpreter Number: 1-866-386-1284

(Only use if an interpreter is unavailable at the primary number above)

*NOTE: If the Telephonic Interpreter Services are used through Propio, notification shall issue to not only phyllis.mcjunkins@illinois.gov but also James Moffat (james.moffat@illinois.gov; 217-557-0122) immediately after using the service for invoicing and accounting purposes.

Telephonic Interpretation Feedback Mechanism

Questions, concerns, or feedback regarding the telephonic interpreter session, including the quality of the telephonic interpretation, should be made directly to PTAB's Executive Director.

American Sign Language Interpretation

American Sign Language (ASL) interpretation services are provided by Multilingual Connections LLC. Requests for ASL interpretation services should be made at least 1-2 weeks in advance. Requests for ASL interpretation services from Multilingual Connections can be made by completing a CSR, obtaining the Executive Director's approval signature, and sending an email to Danny Sronce via email at daniel.sronce2@illinois.gov.

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

ASL Interpreter Feedback Mechanism

Questions, concerns, or feedback regarding the telephonic interpreter session, including the quality of the telephonic interpretation, should be made directly to PTAB's Executive Director.

Complaints may also be made to:

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

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

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

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

A TTY and TDD are auxiliary aids and services for individuals with hearing impairments. A relay system makes it possible for individuals who are deaf to use TTYs to call other people who may not have a TTY. Illinois has the Illinois Relay Center (IRC), also known as "Dual Party Relay." IRC is a 24-hour-a-day, seven-day-a-week service that links communications between those who use a TTY and those who use a standard voice telephone. Those using a TTY can reach the PTAB by dialing 888-261-4188 or 7-1-1.

Translation

The translation is the written or text-based rendering of one language into that of a secondary language. PTAB's documents can be translated into foreign languages by vendors with which the State has contracted. For all documents, PTAB offices should complete a CSR, send the CSR to James Moffat, and send the documents to be translated to David Egan (david.egan@illinois.gov).

In-House Translation Review and Feedback Mechanism

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

1. Preparing materials.

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

2. Translation.

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

3. Revision/Editing.

- “Back-to-English” translation is not recommended as an effective method to ensure effectiveness.
- Translated materials, too, should be field-tested. A simple way of doing this is by working with community providers, community members, and/or bilingual PTAB staff. They can review our documents and provide valuable input.

IV. Vital Document Translation

PTAB has and will continue to engage in the process of identifying vital documents, webpages, etc., to identify all such documents. A document is “vital” if it “contains information that is critical for obtaining ... services and/or benefits or is required by law.” Vital written documents can include appeal forms; detailed instruction forms; other appeal instructions; hearing notices; notices advising LEP persons of free language assistance; PTAB's administrative rules, and PTAB's decision.

PTAB staff has currently identified the following vital documents for translation. This list will be updated periodically with more vital documents.

Appellants

- Residential Appeal Form
- Industrial Appeal Form
- Commercial Appeal Form
- Farm Appeal Form
- Sample Residential Appeal
- Detailed Instructions
- Checklist
- Direct Appeal/Rollover Instructions
- Frequently Asked Questions
- Property Tax Code
- Current Rules

V. Staff Training

The PTAB Coordinator will train all supervisors, managers, and staff regarding the Plan and their PLAN responsibilities. Training will be required within 60 days of the issuance of this PLAN and once yearly. Training on the PLAN and on locating and accessing LEP services will be provided to all new hires, regardless of role, within 30 days of hire. All new staff will be given a copy of this PLAN on their first day of work at PTAB.

LAP training will, at minimum, cover the following topics:

1. Introduction
2. Define Language Access and Why it is Important

3. Describe PTAB's Commitments

4. Overview of PTAB's Language Access Plan

- a. PLAN Objectives
- b. Impact on employees
- c. Timeline

5. Identify Language Access Resources

- a. How to access LEP services
- b. Demonstration(s) on providing Language Access services

6. Summary

7. Contact Information

A link to training modules will be included in the Language Access Plan and posted on PTAB's intranet.

VI. PLAN Monitoring

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

VII. PLAN Complaints

If a person wishes to file a complaint regarding an alleged violation of the parameters of this PLAN, they should file a complaint with the Language Access Coordinator. Complaints must be received within six (6) months of the alleged violation, be in writing, and submitted to the PTAB Language Access Coordinator:

Nancy Adduci
115 South LaSalle Street, Suite 602
Chicago, IL 60603
Phone: 312.793.3264
Email: nancy.adduci@illinois.gov

Within six (6) months of the issuance of this PLAN, PTAB intends to create an electronic complaint form, in fillable-PDF format, accessible from the PTAB's website's homepage (<http://www.ptab.illinois.gov/index.html>) in English and the five most frequently spoken languages among the LEP population in Illinois according to U.S. Census data.

The Language Access Coordinator will discuss any complaint with senior management and a resolution will be identified within 21 business days. The resolution will be communicated to the complainant.

If a complaint is not resolved, PTAB's Language Access Coordinator will contact GOV.NewAmericans@illinois.gov.