

**SUBJECT: IDOA Limited English Proficiency Plan**

**I. Introduction**

This Limited English Proficiency (LEP) plan was developed to ensure equal access to services provided by the Illinois Department of Agriculture (IDOA), Bureau of Meat and Poultry Inspection, for persons with limited English proficiency. LEP persons are defined as individuals who do not speak English as their primary language and who have a limited ability to read, write, speak or understand English. This plan is subject to annual review and updates.

**II. Policy**

It is IDOA Bureau of Meat and Poultry Inspection's Policy to ensure that reasonable steps are taken to provide meaningful access and an equal opportunity to participate in services, activities and programs to individuals whose first language is not English. Should IDOA Bureau of Meat and Poultry Inspection personnel receive requests from current recipients or prospective applicants of inspection services, they should contact IDOA Bureau of Meat and Poultry Inspection headquarters for guidance through their supervisory chain.

**III. Legal Authority**

Title VI of the Civil Rights Act of 1964 prohibits discrimination, in part, on the basis of national origin in the delivery of services or benefits funded by the Federal government. Under this law, federally assisted programs must ensure their activities normally provided in English are accessible to LEP persons and thus do not discriminate on the basis of national origin in violation of Title VI's prohibition against national origin discrimination. Executive Order 13166, "Improving Access to Services for Persons with LEP", signed 011 August 11, 2000, provides further direction, requiring that Federal agencies provide meaningful access to federally assisted programs and activities for LEP persons. In addition, the Order requires that Federal agencies create plans to provide LEP persons with meaningful access to federally assisted programs and activities for LEP persons. In addition, the Order requires that Federal agencies create plans to provide LEP persons with meaningful access to federally conducted programs and activities. As a recipient of Federal funds, IDOA Bureau of Meat and Poultry Inspection must comply with Federal LEP requirements.

In August 2000, the Department of Justice (DOJ) issued guidance for agencies to follow in creating plans to make Federal services, activities and programs accessible for LEP persons.

#### IV. Definitions/Key Terms

**Agency** - The departmental program with delegated authority to deliver programs, activities, benefits and services.

**American English** - The language/dialect primarily used in the United States.

**Bilingual** - The knowledge and ability to understand, speak, read and write fluently in two languages easily.

**Certified Interpreter** - An individual who has taken and passed an examination administered by a knowledgeable authority.

**Discrimination** - The unfavorable treatment or consideration of, or making a distinction in favor of or against, a person based on the group, class or category to which that person belongs rather than on individual merit.

**Federally Assisted Program** - All programs and operations of entities that receive assistance from the Federal government.\

**Interpretation** - Listening to communication in one language and orally converting it to another language while retaining the same meaning.

**Language Access** -Efforts to make programs and services accessible to individuals who are not proficient in English.

**Language Assistance Services** - Interpretation or translation services that assist Limited English Proficient individuals in understanding or communicating in another language.

**Limited English Proficiency Person** - An individual who does not speak English as his or her primary language and has a limited ability to reason, speak, write or understand English.

**Translation** - The process of transferring ideas expressed in writing from one language to another.

**Translator** - A person who converts language into an alternative form of communication so it is understandable to persons who communicate differently.

**Vital Document** - Paper- or electronic written material that contains information that is critical for accessing a program or activity, or is required by law, such as consent forms, applications and notices of rights.

#### V. Federally Assisted Programs

The Bureau of Meat and Poultry Inspection is within the Illinois Department of Agriculture headquartered in Springfield, Illinois. The mission of the department is to protect the health of consumers by providing a comprehensive inspection service to assure that meat and poultry products are safe, wholesome and accurately labeled. Under cooperative agreement with the Federal Food Safety Inspection Service (FSIS), our state program has an obligation to ensure that LEP services are provided to customers (beneficiaries) whose first language is not English. Those services need to be "at least equal to" the services that FSIS provides to its LEP customers.

## VI. Four Factor Analysis

In order to ensure that LEP customers are provided adequate services, IDOA Bureau of Meat and Poultry Inspection, has conducted a four factor analysis. The four factor analysis addresses the following:

1. The number or proportion of LEP persons eligible to be serviced or likely to be encountered by our state program: **A review of the most current data indicates that approximately 4.3% of Illinois residents speak English less than "well". Of these, the majority 2.5% are Spanish speakers. Data will be periodically reviewed for any changes in trends.**
2. The frequency with which LEP persons using a particular language come in contact with the state: **To date, IDOA Bureau of Meat and Poultry Inspection has never received a request for translation assistance from current recipients or prospective applicants. On our webpage, the NON-DISCRIMINATORY statement and USDA poster "And Justice for All" is displayed (which is in both English and Spanish).**
3. The nature and importance of the Illinois meat and poultry inspection program provided to the individual's life: **Food safety is important to everyone and our agency's policy as outlined above is to provide meaningful access to all, including LEP individuals. If documents are deemed vital to a service requested, these would then be translated to the language required by the individual. Options for contracted interpretation services are currently being explored as well, so these could be made available to LEP individuals.**
4. Determine the resources available to LEP persons and the costs to the state: **Should a request for language assistance be received through the Director, the contract with a certified translation service would be processed through the business office for approval. The costs would vary depending on services requested. This resource provides both interpretation and translation services. The Illinois meat and poultry inspection program employs one Bilingual (Spanish) inspector and has another inspector that speaks Spanish "very well". Both of these employees work in an area with a higher number of Spanish speaking beneficiaries.**

## VII. Implementation

Our current implementation goals include similar actions and timelines as listed in Appendix 1 of the April 2017 guidelines for Federally assisted programs for LEP implementation strategy. This table is included as part of this LEP Plan for our state meat and poultry inspection program.

<b>RESPONSIBLE PERSON/STAFF</b>	<b>ACTION TO BE TAKEN</b>	<b>TIMELINE</b>
<b>Bureau Chief</b>	1. Ensure employees who interact with LEP individuals receive LEP training.	Ongoing
	2. Develop an LEP Plan.	Completed
	3. Gather data for languages spoken in geographic areas being serviced.	Ongoing
	4. Identify vital documents to be translated.	Completed
	5. Compile and analyze data gathered to determine what LEP services are needed.	Ongoing
	6. Secure contractor for translation and interpretation services.	Completed
	7. Ensure that there is adequate funding, and that other resources are available to provide effective and efficient LEP services.	Ongoing
	8. Notify beneficiaries of LEP services.	Completed
	9. Track LEP interactions.	Ongoing
	10. Report LEP interactions to the Agency's Civil Rights Staff.	Annual basis

## VIII. Communication/Outreach (Current LEP Practices)

The USDA poster "And Justice for All" is displayed (which is in both English and Spanish) in locations where recipients of and applicants for inspection services may visit, i.e. in-plant

government offices and the IDOA Bureau of Meat and Poultry Inspection website. A copy of the nondiscriminatory statement policy is published on applications for inspections services, grants of inspection, letterhead and the IDOA Bureau of Meat and Poultry Inspection website. We are currently in the process of surveying our meat and poultry inspection personnel to see if they have regular contact with LEP beneficiaries. Based upon the results of the survey, IDOA Bureau of Meat and Poultry Inspection will determine if there is a need for translation of vital documents. This information will then be made available on our website.

## IX. LEP Training

IDOA Bureau of Meat and Poultry Inspection employees who encounter or may encounter LEP persons shall receive training biannually (every other year). Currently the Assistant Bureau Chief is responsible for maintenance of training records. The Bureau personnel are now undergoing LEP training which should be completed by July 1<sup>st</sup> 2020.

## X. Roles and Responsibilities

The State Director is responsible for an annual review and update of this LEP Plan as needed. This administrative directive is part of the mandatory reference material for all inspection personnel. Any requests for interpretation or translation shall be directed to the Director through the supervisory chain. Translation services for state agencies in Illinois are managed and provided by Illinois Department. of Innovation and Technology (DOIT), see link below for the website with more information.

<https://www2.illinois.gov/sites/doit/services/catalog/telecom/Pages/language-interpretation.aspx>

The IDOA Bureau of Meat and Poultry Inspection offers its programs to people of all ages, regardless of race, color, sex, religion, national origin or disability, and is an equal opportunity employer and provider.

Dr. Kris Mazurczak, Bureau Chief  
Bureau of Meat and Poultry Inspection