



State of Illinois
Department of the Lottery



Language Access Policy
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Department of the Illinois Lottery: Language Access Policy

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Introduction

The Illinois Department of Lottery (“Lottery”) is a state agency charged with serving Illinois customers by administering the Illinois Lottery laws and regulations and collecting lottery revenues in a fair, consistent, and efficient manner for customers and taxpayers, alike, as well as provide accurate and reliable funding and information in a timely manner. The agency interacts with the public through in-person services, online applications, telephone, email, and mail.

Purpose

The purpose of this policy and implementation plan is to ensure that the Lottery’s programs and services fulfill legal obligations by providing meaningful access to its state websites, documents, information, and services to individuals with limited English proficiency, as well as individual with visual, auditory, learning, physical, or speech impairments that affects their ability to use information technology. Specifically, the Lottery must:

- a) Establish and implement a Language Access Plan and track its progress annually.
- b) Identify a Language Access Coordinator.
- c) Collect and analyze data on demand for agency services in languages other than English.
- d) Provide written translations of vital documents into non-English languages that meet established language access thresholds.
- e) Offer interpretation services.
- f) Train staff on language access requirements and compliance.

Authority

This policy is issued under the authority of the Illinois Lottery and is consistent with the agency’s mission to provide equitable and accessible services to all individuals. The policy compiles with all applicable federal and State laws, rules, and regulations governing nondiscrimination, civil rights, accessibility, and meaningful access. These include but are not limited to:

- Illinois Lottery laws, rules, and regulations
- Title VI of the Civil Rights Act of 1964 (*42 U.S.C. § 2000d et seq.*)

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- Illinois Civil Rights Act of 2003 (*740 ILCS 23/5*)
- Illinois Language Equity and Access Act (ILEAA) (*15 ILCS 56 et seq.*)
- Americans with Disabilities Act of 1990
- Section 504 of the Rehabilitation Act of 1973
- Illinois Information Technology Accessibility Act (IITAA) (*30 ILCS 587 et seq.*)

The Illinois Lottery is responsible for ensuring that its programs, services, and communications adhere to these statutory and regulatory requirements.

Scope

This policy shall apply agency-wide to all full-time, part-time, and seasonal employees.

Definitions

For the purposes of this policy, the following definitions apply:

Bilingual: The ability to use two languages proficiently.

Language Access Plan (LAP): A set of tailored goals and action items designed to improve a State of Illinois government agency's language access services. A LAP includes measurable actions steps related to data collection, translation of vital documents, training of public contact staff, outreach initiatives, and the hiring of bilingual staff, all of which the agency commits to implement within a defined timeline.

Customer: An individual who seeks, attempts to benefit from, or receives services provided by the Illinois Lottery.

Interpretation: The conversion of spoken communication from one language (the source language) into equivalent spoken communication in another language (the target language). Interpretation may occur in person or over the phone. While commonly confused with "translation", interpretation refers to oral communication, whereas translation refers to written text.

"I Speak" Cards: Wallet sized cards issued by the State of Illinois Office of Human Rights that allow limited or non-English proficient individuals to identify their primary language. The cards state, in English and the identified non-English language: "I speak [non-English language]. I need assistance and have the right to receive assistance in my spoken language. Please provide me with an interpreter and note my spoken

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language in your permanent records. Thank you”

Language Access Coordinator (LAC): The designated Illinois Lottery official responsible for coordinating and overseeing activities required to ensure compliance with this policy.

Language Access Services: Activities that assess the need for assistance in a language other than English and provide interpretation and/or translation services to facilitate effective communication.

Language Line: Propio Translator Services, a contracted vendor that provides interpretation services by telephone for State of Illinois employees.

Language ID Guide: A language identification tool provided by Language Line and distributed by the Language Access Coordinator to assist staff in determining a customer’s primary language.

Language threshold: The Lottery will translate vital documents into a non-English language when: (a) the agency’s eligible service population includes more than 1,000 limited English proficient (LEP) persons in that language; or (b) LEP persons in that language comprise more than five percent (5%) of persons served. If fewer than fifty (50) persons reach the five percent (5%) threshold, the Lottery will provide written notice, the primary language of the right to free, competent oral interpretation of those materials. See *15 ILCS 56/25 (d)(2)(A)-(B)*.

Limited English proficient (LEP): An individual who does not use English as a primary language and has limited or no ability to speak, read, write, or understand English.

Members: All Illinois Lottery employees, as well as volunteers and contractors who provide direct services to the public on behalf of the Lottery.

Primary language: The language an individual is most comfortable using, typically but not always the person’s first or native language.

Translation: The conversion of written wording from one language (the source language) into equivalent wording in another language (the target language). Although the terms are often used interchangeably in public and media contexts, translation refers specifically to written text, while interpretation refers to oral speech.

There are two forms of translation:

- a) **Written translation:** The conversion of written text from the source language into written text the target language.

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- b) Sight translation: The oral rendering of written text from the source language into the target language. Sight translation is not typically a direct word for word translations.

Vital documents: Applications, notices, forms, agreements, and customer-facing materials that the Illinois Lottery publishes or distributes to communicate important information about prize claims, player rights, Lottery requirements, or processes that customers must understand to participate in the Lottery activities.

Responsibilities

Lottery Chief of Staff will:

- a) Develop (or designate a member or team to develop) a language access policy
- b) Establish (or designate a member or team to establish) procedures for:
 - i) Providing interpretation over the phone and in person.
 - ii) Engaging in written communication with LEP customers.
 - iii) Translating the first pass of vital documents using Google Translate or another approved service.
 - iv) Collecting data on LEP encounters; and
 - v) Conducting community outreach.
- c) Appoint a Language Access Coordinator responsible for overseeing the agency's LAP and establish a Language Access Team to assist the LAC.

Language Access Coordinator

- a) Ensure the Lottery's compliance with the State and Federal Language Access guidelines, laws, and regulations.
- b) Oversee the implementation of the agency's LAP and submit and track the Agency's progress in implementing the plan.
- c) Provide guidance, advice, resources, and training to Lottery members regarding the language access services.
- d) Identify and maintain a record of the Lottery's vital documents.
- e) Track, monitor, and investigate public complaints regarding alleged language access violations at the Lottery.
- f) Recommend corrective action for conduct contrary to this policy.

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- g) Monitor the ongoing implementation and effectiveness of the Lottery's Language Access Plan, including reviewing LEP data, translation practices, and service trends, and provide updates to the Office of New Americans (ONA) as required for statewide compliance.

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Policy

1. Data Collection

The Lottery must collect and report data on the non-English languages spoken by LEP customers; frequency with which LEP customer interact with the Lottery, the nature of those interactions, and the resources available to provide language assistance. The data collection serves two primary purposes:

- a) **Threshold Determination:** To determine whether the Lottery has reached the language threshold for a specific non-English language, thereby identifying which language(s) require translation of vital documents.
- b) **Customer Record Accuracy:** To record a customer's primary language in their file, whenever possible, ensuring that future interactions with identified LEP customers include appropriate and consistent language accommodation.

LEP Population Overview

Statewide demographic data from the Office of New Americans (ONA) indicates that approximately 1.08 million Illinois residents speak English less than "very well." These individuals represent a portion of the Lottery's eligible service population, which includes players, claimants, retailers, and customers who interact with the Lottery through Prize Centers, retailer locations, customer service, or online platforms. The Lottery will use these statewide LEP estimates, along with internally collected encounter data, to understand language needs and ensure appropriate translation and interpretation resources are available.

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

Accordingly, members shall document all agency encounters with LEP customers. The Language Access Coordinator shall track the resulting data. At the end of each fiscal year, the Language Access Coordinator shall submit an implementation report identifying the non-English languages that meet the agency's language threshold, as well as the resources available to the LEP populations who speak these languages.

2. Signage

Ensure that all Illinois Lottery facilities open to the public feature visible signage informing customers of their rights to obtain assistance in a language they can understand, free of charge. Signage must include information in all non-English languages that meet the agency's language threshold as well as the resources available to the LEP populations who speak these languages.

Where ONA templates are not yet available, the Lottery will use interim signage with substantially similar content. *15 ILCS 56/15(b)(4)*.

3. Translation

Lottery will use State of Illinois DoIT Enterprise Translation Hub, Google

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Translate, or any State approved third-party services, to provide the preliminary review of written translations of vital documents into all non-English languages that meet the agency's language threshold. These tools support efficient draft translation of documents such as claim forms, notices, complaint forms, and other materials related to customer rights.

For translation planning purposes, the Lottery identifies a document as "vital" when it contains information necessary for players or claimants to understand Lottery processes, comply with requirements, or avoid negative consequences related to claims, prize payments, or account actions. The Lottery determines required translation languages based on the agency's language threshold and documented LEP customer trends.

Draft machine translations may be used only as a first pass. Before publication or execution, all vital documents must undergo review and approval by a qualified translator or language-services vendor meeting ONA/State standards. To ensure broad access, members shall distribute translated versions within the Lottery, make them available in Prize Centers, and post them online.

Documents received from Lottery clients in other languages may be initially processed using the DoIT Enterprise Translation Hub or Google Translate. However, documents that relate to legal, financial, or policy-critical matters must undergo human review before being acted upon.

Lottery has identified the following vital documents for translation. The list will be updated regularly as changes or additions occur.

- i. Claim Form
- ii. Offset Letter
- iii. Ticket Incident Form
- iv. Interpreter Services Language Waiver
- v. Prize Election Form
- vi. Complaint Form

4. Interpretation

The Lottery will establish and maintain full and effective communication with customers of all English proficiency levels. The Lottery shall provide

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interpretation services either over the phone or in person, whichever is most effective using the customer's primary language whenever an individual is identified as LEP. In providing interpretation services, the Lottery shall:

- a) Avoid making assumptions about a customer's primary language and take reasonable steps to accurately determine it.
- b) Provide interpretation whenever a customer requests it, regardless of the customer's perceived level of English proficiency.
- c) Not discourage LEP customers from seeking Lottery and not deny services to customers based on language ability.
- d) Ensure the services are delivered in a timely manner and without delays substantially greater than those experienced by English proficient customers.
- e) Use only qualified professional interpreters to serve LEP individuals; family members, friends, neighbors, bystanders, volunteers, and children shall not be used as interpreters.
- f) Make interpretation services available to LEP customers participating in Lottery administrative hearings, regardless of whether the customer is accompanied by an advocate or attorney, including using Propio Translator Services.
- g) Within the next two years, make vital documents available on the Lottery's website and provide an option that translates web content into Spanish.

5. Disability Access

The Illinois Information Technology Accessibility Act (IITAA), 30 ILCS 587/1 et seq., requires Illinois agencies and universities to ensure that their websites, information systems, and information technologies are accessible to individuals with disabilities.

The Lottery's Website is currently accessible to individuals with disabilities. The Lottery plans to perform regular testing of its website to ensure continued disability access compliance.

If an update needs to be made to a form or to the website, a limited number of people are authorized to make changes. These authorized individuals have been trained regarding posting materials to ensure that they are accessible to individuals with disabilities.

Additionally, all contracts are subject to the Procurement Code. The Lottery is

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required to use the solicitation and contract templates created by the Chief Procurement Office of General Services (CPO-GS). These templates include Standard Certifications that provide, in part:

“Vendor certifies that information technology, including electronic information, software, systems and equipment, developed or provided under this contract comply with the applicable requirements of the Illinois Information Technology Accessibility Act (“IITAA”) Standards as published at (www.dhs.state.il.us/iitaa) 30 ILCS 587.”

6. Waiver of Language Access Rights

LEP customers may choose to use a family member, friend, or other individual as their interpreter, or may decline the Lottery’s language access services. When a customer insists on using their own interpreter or refuses offered language assistance, the Lottery shall obtain written consent from the customer acknowledging and waiving their right to Lottery provided translation and interpretation services.

7. Bilingual Staff

The State of Illinois Language Access Policy identifies the following foreign languages as covered languages: Spanish; Chinese; Polish; Arabic; Tagalog; and Hindi. The Lottery will maintain a dynamic list of covered languages based on ONA’s Language Needs Assessment Report and the Lottery’s encounter data and thresholds, updated at least annually.

The Language Access Coordinator shall maintain a list of bilingual staff members who have agreed to serve as interpreters for LEP customers whose primary language they speak. Staff who wish to be designated as interpreters must meet the following criteria:

- a) Communicate fluently in English and in the non-English language(s) in which they claim proficiency.
- b) Demonstrate the ability to communicate accurately in both languages.
- c) Interpret concepts precisely without altering, adding, or omitting meaning in either language.
- d) Understand and adhere to confidentiality requirements appropriate to their role.

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The Lottery shall take reasonable steps to screen self-identified bilingual staff members who request to be placed on the list of staff interpreters. Based on this list of available staff interpreters and both the established and anticipated demand for language access services, the Lottery shall determine its existing capacity for assisting LEP customers. When additional language access capacity is required, the Lottery may consider bilingual proficiency as a preferred qualification for existing budgeted public contact positions.

The Lottery will adopt ONA/DHS qualification standards for bilingual roles, require a proficiency assessment (oral/written) before placement on the interpreter roster, and conduct annual re-verification. *15 ILCS 56/15(a)(6), 15 ILCS 56/15(b)(6), and 15 ILCS 56/30(b)(2)(C).*

8. Language Access Training

The Lottery must maintain proficiency in the requirements and legal obligations for serving LEP customers. Language access training should be provided as part of the onboarding process for all new employees and as part of ongoing professional development for existing employees.

Training will be provided for all Lottery staff, with particular emphasis on employees who are likely to interact with LEP individuals. Training will cover the Lottery's Language Access Plan (LAP), related policies, and available resources. All relevant staff must complete LAP training within the first 30 days of employment. The Lottery will incorporate language access training materials into onboarding and will encourage employees to complete the OneNet HFS Unconscious Bias training.

Training will focus on:

- The importance of offering language assistance services
- Effective and respectful communication with LEP individuals
- The types of translated information available to LEP individuals and where such information can be accessed
- Familiarity with the tools the Lottery provides to support customers needing translation services and to assist staff in providing such services

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The Language Access Act only applies to a covered entity's contractors and grantees. The Lottery licenses sales agents to sell lottery tickets; licensees are separate and distinct from contractors and grantees. Therefore, because the Act applies only to contractors and grantees, the Lottery's licensees are not subject to the Act.

Notwithstanding the above, all Lottery contracts with contractors and grantees should include language-access obligations consistent with ILEAA.

9. Language Access Complaints

The Lottery maintains an internal complaint process and provides a written guide for customers and employees who have needs the Department may not be able to meet. Individuals may file a complaint with the Department's EEO Officer, the Illinois Department of Human Rights and/or the Equal Employment Opportunity Commission alleging a violation of applicable state or federal language access laws and regulations.

Customers may file their complaints directly on the "Contact Us" page on the Lottery's website or through the Lottery Player Hotline. A person or organization acting in the interest of the customer may also file a complaint on the customer's behalf. The Lottery shall not retaliate against complainants and or their representatives and shall provide them with the same level of service afforded to all other customers.

When a customer contacts the Lottery wishing to file a language access complaint, members shall notify the Language Access Coordinator and provide the customer with resources identified in Section 10.

The Lottery will maintain a dedicated mailbox and web form for language-access complaints, available in English and the top encountered languages.

The Lottery will acknowledge receipt of a complaint within three (3) business days. The Lottery shall investigate the allegations and respond within thirty (30) calendar days. The Language Access Coordinator for the Lottery shall log each complaint, outcome, corrective action, and date closed.

If a complaint is not resolved timely or the resolution is inadequate, the Language Access Coordinator will refer the matter to the Governor's Office of New Americans (ONA) for information resolution. *15 ILCS 56/15(b)(5). 15 ILCS 56/30*

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10. Language Access Procedures

Identifying LEP Individuals

Step 1. Identify whether the person has Limited English proficient (LEP).

- a) The person self-identifies or is identified as LEP by a companion.
- b) The person requests an interpreter.
- c) Available documentation or aids indicate the person's lack of English proficiency.
- d) LEP status is verified by a professional interpreter or bilingual staff. For example, during the interaction it becomes evident the person does not speak and understand English well enough to effectively participate or to understand and answer questions without difficulty.

Step 2. Determine the language spoken by the LEP person.

- a) The person self-identifies their primary language.
- b) The person's companion or available documentation indicates the primary language.
- c) Use a professional interpreter or bilingual staff.
- d) Use of job aids that assist in identifying primary language, such as the "I Speak" poster.

Step 3. Identify a resource to provide language assistance.

- a) Utilize bilingual staff.
- b) Utilize the professional language services provider, Propio

Walk In

LEP individuals may utilize an onsite interpreter (Lottery bilingual staff proficient in the LEP client's identified language). If an onsite interpreter is unavailable, the Lottery will coordinate a three-way call with Lottery staff, the LEP individual, and an interpreter from Propio Language Services. See *Telephonic Interpretation* for Propio instructions.

The Lottery does allow LEP individuals to use their own interpreter, and Lottery staff may also use Propio Language Services to ensure information is being interpreted accurately.

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Call Center

LEP individuals may utilize Lottery bilingual staff proficient in the LEP client's identified language, or Lottery staff will coordinate a three-way call with Lottery staff, the LEP individual, and an interpreter from Propio Language Services. See *Telephonic Interpretation* for Propio instructions.

11. Bilingual Staff

There are three Lottery staff members who are fluent in Spanish and receive supplemental bilingual pay to support direct communication with Spanish speaking customers. A list of these staff members and their phone numbers is available to Lottery personnel in the Directory listed on Illinois Lottery Intranet. Labeled "SS". If bilingual staff are not available to assist an LEP individual, members should utilize Propio Translation Services to ensure timely and effective language assistance.

12. Telephonic Interpretation

Telephonic Interpreter Services are made available for all walk in and call center contact with the public. If a member of the public visits or calls Lottery and does not speak English, Lottery will contact *Propio Language Services* for interpretation services by taking the following steps.

Using Propio

1. **Dial: 1-866-828-3280**
2. When prompted
 - For Spanish interpreter
Press 1
 - For all other languages
Press 2

Enter the 2-digit language (see Telephonic Interpreting Services, attached)
3. Enter the 5-digit access code# XXXXX
4. Provide to agent:

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- Caller's first name, initial of last name and phone number with area code

13. Resources

The Lottery shall have the following resources available to better serve LEP customers: digital and hard-copy translations of vital documents; access to contracted in-person and telephonic interpreters; materials from the Department of Human Rights such as "I Speak" Cards and Language ID Guides; and training as outlined in the Lottery's LAP.