

Nevada Department of Wildlife Language Access Plan 2024

Section 1: Purpose and Authority

The purpose of this plan is to establish an effective plan and protocol for Nevada Department of Wildlife (NDOW) personnel to follow when providing services to, or interacting with, individuals who have limited English proficiency (LEP).

It is NDOW’s mission to protect, conserve, manage and restore wildlife and its habitat for the aesthetic, scientific, educational, recreational, and economic benefits to the citizens of Nevada and the United States, and to promote the safety of persons using vessels on the waters of Nevada. To fulfill our mission, it is a priority for us to be able to communicate and share information effectively with all of those we serve. This plan and its implementation will help us fulfill our mission and better serve our public.

Nevada’s Senate Bill 318 (SB318) and the federal guidance on Title VI both agree that language should not be a barrier to accessing governmental programs and services. As SB318 puts it, “Persons with limited English proficiency require and deserve meaningful, timely access to government services in their preferred language.” Moreover, it makes it clear that it is the responsibility of government to provide that access:

State and local agencies and entities that receive public money have an obligation to provide meaningful, timely access for persons with limited English proficiency to the programs and services of those agencies and entities.

As a federal aid recipient, NDOW is committed to compliance with Nevada Senate Bill 318 and Title VI of the Civil Rights Act of 1964, 2 C.S. § 561 et seq. (Act 172 of 2006) in ensuring meaningful access to State services and programs for individuals with limited English proficiency.

Section 2: Acronyms and Definitions

For the purposes of this plan please reference this section to understand how the following acronyms, terms and corresponding definitions used within NDOW’s Language Access Plan.

Acronym	Term	Definition
	Bilingual Fluency	The ability to speak and understand two languages easily and accurately. Bilingual fluency does not always mean that a person can serve as an interpreter or translator.

	Certified Interpreter	An interpreter who has passed a valid and reliable certification exam administered by an independent entity.
	Certified Translator	Certified translators are linguists who have passed some kind of exam which assesses their ability to accurately translate from one language into another. The exam is usually given by a professional association such as the American Translators Association or by a state or local government.
	Dual-role Interpreter	A multilingual employee that has been tested for language skills and trained as an interpreter; and is engaged in interpreting as part of their job duties.
	Language Access	Effective strategies to engage and communicate with people acknowledging that language is not a barrier.
LAC	Language Access Coordinator	NDOW staff that have been delegated the responsibility of developing and implementing language access strategies as identified in the Language Access Plan.
LAP	Language Access Plan	A document that identifies how to effectively provide services to LEP individuals.
LEP	Limited English Proficiency	A person with limited English proficiency is unable to speak, read, write, or understand the English language at a level that permits them to interact effectively with NDOW staff, or engage in NDOW programs or services. Individuals who communicate through American Sign Language are included in this definition.
	Meaningful Access	When language assistance provided is accurate, timely, and effective at no cost to the LEP individual. It is also the ability of an LEP individual to access, apply for, and receive resources without significant restrictions from language barriers.
NDOW	Nevada Department of Wildlife	The State of Nevada agency whose mission it is to protect, conserve, manage and restore wildlife and its habitat for the aesthetic, scientific, educational, recreational, and economic benefits to citizens of Nevada and the United States, and promote the safety of persons using vessels on the waters of Nevada.
NRS	Nevada Revised Statutes	Current codified laws of the State of Nevada.

	Vital Documents	Documents that provide essential information. Examples include applications, consent, and complaint forms, notice of rights, notice of activities, and notices advising of the availability of free language assistance.
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Section 3: General Policy

NDOW recognizes that we serve the public which includes LEP individuals. It is the policy of NDOW to ensure meaningful access to the services we provide to LEP individuals.

It is Nevada’s policy to make services or programs accessible to every person regardless of their ability to speak, understand, read, or write English. NDOW intends to take all necessary steps to provide LEP individuals with meaningful access to its services and programs. NDOW seeks to reduce barriers by increasing its capacity to deliver services and benefits to people in their preferred languages.

To best serve LEP individuals NDOW endorses the following policies:

- NDOW is committed to equity and will take all steps required to provide limited English proficient (LEP) individuals with meaningful access to all its services, programs, and activities.
- The agency, rather than the LEP individual, bears the responsibility for providing appropriate language services, regardless of the LEP individual’s preferred language, at no cost to the LEP individual.
- Staff make every effort to attain and record individuals’ language needs.
- Staff will not encourage individuals to use informal interpreters.
- No staff may suggest or require that an LEP individual provide an interpreter to receive agency services.

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NDOW Language Access Coordinators (LACs) will work with staff across divisions and with the help of division administrators to develop and implement NDOW’s Language Access Plan (LAP).

LACs are appointed by the NDOW director and can be replaced at the director's discretion at any point in time. Currently, NDOW does not have staff capacity to dedicate a full-time employee to develop and implement NDOW's Language Access Plan. Until additional staff capacity increases are realized NDOW LACs will be Department staff who will be asked to take on additional duties as the Department LAC in addition to their regular duties.

Section 4: Profile of NDOW's LEP Clients

NDOW is committed to tracking the languages preferred for communication among our limited English proficient (LEP) clients so that we can better provide meaningful, timely access to our services and programs without regard to any language impediments.

NDOW does not currently have a digitally based tracking system in place to identify and track the total LEP clients served, total indigenous served, total refugees served, literacy level of individuals, and/or the services/programs these groups of individuals are accessing as identified in SB 318. To effectively track, collect and maintain the categorical information cited above NDOW will need acquire the resources necessary to contract the development of a new client tracking system. Until the time that NDOW can do so we will use census data, survey tools, and a variety of other resources and means to understand the needs of the public we serve.

In 2023, the Department worked with its current license vendor, Gordon Darby, to add a question to each client's customer profile in the licensing system to track language preference for individual clients. The Department recognizes that not every customer we serve uses our license system which is why we would need to implement a new client tracking system. However, since this change was made NDOW has identified approximately 1,040 customers whose language preference is Spanish, and about 240 customer who prefer a language besides English or Spanish. This makes up approximately 1% of customers who have shared their language preference with us.

U.S. Census Bureau Data

Recent U.S. Census Bureau Data can be found at <https://data.census.gov/cedsci/table?q=lanuage%20spoken%20at%20home%20nevada&tid=ACSST5Y2020.S1601>

NDOW serves all the public and not just those with a customer profile and recognizes that 80% of people in Nevada are Limited English Proficient (LEP) or 80% of LEP individuals' preferred language is Spanish, and is the second most common language in Nevada, according to the most recent U.S. Census.

Internal Department Survey Data

In July 2022, as part of an information gathering effort to help develop NDOW's LAP the Department conducted an agency-wide internal survey directed to staff who interact with

customers, clients, or members of the public to help the Department better understand how the agency currently serves LEP individuals.

The following information was collected from the 82 Department staff that completed our initial internal LAP survey in July 2022:

- In the 12 months immediately preceding the survey it is estimated that NDOW staff interacted with a total of approximately 1,046 LEP individuals.
- Most staff interacted with LEP individuals in-person (49%), some staff interacted with LEP individuals over the phone (35%) and a few staff interacted with individuals online (9%).
- 18% of staff in the last year provided a customer, client, or member of the public with professional services (written translations, oral/sign translations, interpretation services, etc.) or arranged for professional services to be provided to them.
- When asked, “Do you know what professional services (written translations, oral/sign translations, interpretation services, etc.) NDOW provides its customers, clients, and members of the public?” staff answered:
 - No – 70%
 - Unsure – 23%
 - Yes – 7%
- NDOW staff provided professional translation services to or arranged for professional services to be provided to approximately 56 people in the last year.
- Although 20 NDOW employees self-identified as bilingual only 3 of those employees answered Yes to considering becoming a certified interpreter.
- 45% of staff answered Yes to interacting with customers, clients or members of the public who relied on a friend or family member to help translate for them. Of those staff it is estimated that there were approximately 502 interactions in the past 12 months in which a customer, client or member of the public relied on a friend, or family member to help translate for them.
- Based on answers to the survey most staff (96%) do not track how many customers, clients, or members of the public request professional services (written translations, oral/sign translations, interpretation services, etc.) or translated materials. Of those that said that they do it was cited that NDOW keeps a call log notating the purpose of the call.
- Staff were asked what they would like NDOW to focus on that would provide the greatest benefit to our customers, clients, and members of the public? Staff were able to choose multiple selections and their answers to that question were as follows:
 - Hiring more certified bilingual staff (54%)
 - Having publications and/or other printed materials translated into Spanish (77%)

- Translating website pages into Spanish (58%)
- Provide training to staff on how to connect people to professional interpretation services (54%)
- Other (8%)

Section 5: NDOW Language Access Services and Procedures

NDOW is committed to providing LEP individuals with timely and meaningful access to NDOW programs and services at no cost to the LEP individual. In this section the Department outlines the variety of means it uses to make sure language is not a barrier to LEP individuals.

Vital Documents

Vital documents provide essential information. Examples include applications, consent, and complaint forms, notice of rights, notice of activities, and notices advising of the availability of free language assistance.

NDOW's Language Access Coordinator(s) with direction from division administrators and the director's office work to identify NDOW's vital documents. Identified vital documents include the following:

- Boating Safety Information and other law enforcement-related forms
- Public Signage (i.e.. Wildlife Management Area (WMA) and Urban Ponds)
- Office Signage

The following items are not considered "vital documents" but to best serve LEP individuals, NDOW seeks to translate the following information into Spanish should funds be made available.

- Boating registration-related forms
- Informational letters sent to customers
- WMA and other related pamphlets
- Hunting Regulations
- Fishing Regulations
- Small Game Regulations
- Website
- Program-related information (i.e., Trophy Fish Certificates, Awards, Wildlife Education)
- Meeting notices and support material upon request (Meeting Date, Time and Location will automatically be translated on website for each meeting. Customers can request translated support material.)

Currently the only means for the Department to have documents translated for LEP individuals is to contract the appropriate professional translation services.

The Department has identified the most appropriate documents for translation which include any safety-related information, essential forms, and public signage. When other circumstances present themselves that vital documents need to be translated into another language for an

LEP client, customer, or member of the public the Department will contract the appropriate professional services using state approved contractors to make sure language is not a barrier to any LEP individual, at no cost to the LEP individual.

The Department will be exploring options to increase staff capacity to hire staff that can translate our vital documents into Spanish.

NDOW Bilingual Staff

As of July 2022, based on the answers to our internal staff survey the Department has approximately 20 bilingual employees that self-identify as bilingual. Although we have bilingual staff, they do not qualify as certified translators.

NDOW Dual-role Staff

The Department will also be exploring ways to increase staff capacity to employ (3) dual-role employees. It is recommended that two of these employees be dual-role administrative staff that can speak, read, and write both English and Spanish to better serve clients, customers, and members of the public both in-person and over the phone. It is also recommended that the Department hire a dual-role PIO that can speak, read, and write both English and Spanish to help the Department translate our vital documents including but not limited to publications, notices, memos, public service announcements, and webpages into Spanish to better serve our LEP public.

Oral/Sign Language Services

When oral/sign language services are requested, the Department utilizes state approved contractors that specialize in interpretation and translation services. The State of Nevada vets and approves of contractors for them to become state approved contractors to ensure that they are fully capable of providing the services requested.

Written Language Services

When written language services are requested, the Department utilizes state approved contractors that specialize in written translation services. The State of Nevada vets and approves of contractors for them to become state approved contractors to ensure that they are fully capable of providing the services requested.

Community Outreach and Engagement

NDOW is committed to ensuring that the larger LEP community is aware of and able to access all available language services. As part of the Department's LAP NDOW will be exploring a variety of options to better publicize improved language services in the community.

The Department will also be looking for opportunities to better engage LEP individuals by increasing staff capacity to meaningfully engage the LEP community. When staff capacity increases are realized the Department will identify effective means to engage LEP individuals.

Procedures and Resources for LEP Community Outreach:

NDOW is committed to meaningfully engaging with broad, diverse groups of Nevada's public including Nevada's LEP communities. Using a variety of means the Department is seeking out information to better understand and serve the public.

Although specific community outreach and engagement activities have occurred somewhat sporadically in the past below are Department examples of LEP community outreach and engagement.

- In-person hunter education classes have been taught by hunter education instructors in both Spanish and Chinese.
- The Department provides access to online hunter education courses narrated in Spanish.
- When attending tabling events in which staff expect to encounter LEP individuals bilingual staff translate handouts into Spanish to be shared at tabling events.
- The Department actively seeks out groups and agencies that work with LEP communities to seek out advice as to how to better serve LEP communities.
- NDOW publishes a Spanish excerpt of fishing regulations within its annual fishing regulations publication.
- Translated Outdoor Education informational materials (i.e., How to use outdoor recreation related phone apps).
- Provided website translation functionality to the Department website via a Google Translate widget.
- Added a Spanish language preference option to our Greeting Message on the license vendor phone tree.
- Added the option to speak to a Spanish-speaking licensing agent from our license vendor.

The Department will be exploring a variety of ways to increase staff capacity to meaningfully engage and serve LEP communities.

Providing Notice of Language Assistance Services

The Department will provide notification of the language services it provides at all relevant points of contact including but not limited to regional field offices, Department headquarters, and on the NDOW website.

Cultural Competency Resources

The Department does not currently own or have access to relevant resources or training materials in relation to cultural competency. The Department will explore opportunities to acquire these resources and training materials. The Department will also request that the State of Nevada draft and develop these resources for agency use.

Section 6: NDOW Language Access Services

NDOW is committed to providing LEP individuals full access to our services and programs. Towards this end, NDOW requires its staff to follow the procedures described below to ensure meaningful access to available language services. Moreover, NDOW is committed to compliance with these procedures and provides the staff with the training described below to help ensure that all staff are familiar with these procedures and recognize their importance to NDOW's mission.

Language Access Procedures

Identifying Client Language Needs and Preferred Language: The following procedures should be adhered to when interacting with LEP individuals.

1. Interact appropriately with LEP clients
2. Determine clients' preferred language
3. Inform clients of the availability of language services
4. Record and track LEP client language preferences so that the data will follow them throughout their interactions with Nevada Department of Wildlife.

Accessing Appropriate Oral/Sign Language Services:

Staff should seek appropriate oral/sign language services as outlined below.

- The preferred method of serving LEP clients is by using competent bilingual staff able to provide services directly to the clients in their preferred language.
 - Available, trained, competent bilingual staff may be used for in-person or telephone interpreting to support other staff.
- Staff should seek assistance from state approved contractors that specialize in professional translation services when a customer, client, or member of the public requires translations services that staff cannot provide.
 - Staff should recognize that certain circumstances may require specialized interpretation and translation services even when staff with bilingual abilities are available.
 - Please use this [link](#) to find State-approved translation services.

- If no there are no competent bilingual staff or professional translation services available at the time of the request, staff must make a sincere effort to accommodate customers as quickly as possible to make sure LEP individuals are provided meaningful, timely access the services NDOW provides.

Accessing Appropriate Written Language Services:

Any customer, client or member of the public may request any documents be translated into a language other than English to meet their language preference needs. Staff will make a sincere effort to provide those translated documents and notices as quickly as possible.

Language Services Quality Assurance:

NDOW is committed to ensuring that all language service providers it uses are qualified and competent to provide those services. The Department utilizes state approved contractors that specialize in interpretation and translation services. The State of Nevada vets and approves of contractors for them to become state approved contractors to ensure that they are fully capable of providing the services requested.

Section 7: Evaluation of and Recommendations for NDOW's Language Access Plan

NDOW is committed to monitoring the performance of the above policies, procedures, and resources to ensure that its LAP is responsive to the needs of both NDOW and the public it serves. At a minimum, NDOW will review, evaluate, and update its LAP biennially.

Parties Responsible for LAP Maintenance:

The Language Access Coordinators will work with Department Leadership as well as staff across all divisions to ensure the Language Access Plan is reviewed on a biennial basis and updated as needed.

Criteria and Methods for LAP Evaluation:

The Nevada Department of Wildlife will track and monitor how often translation services are utilized, will work to increase staff capacity to better serve LEP individuals and will review any comments from the public to make any necessary revisions to the plan, if needed.

Performance Monitoring Data:

The Nevada Department of Wildlife will add any pertinent data and information in subsequent versions of the LAP. The Department will also continue to collect and analyze staff feedback to help determine how effectively we are serving LEP individuals.

Section 8: Proposed LAP Revisions and Costs to Implement NDOW LAP

The Nevada Department of Wildlife will identify, assess, and implement any proposed changes to the LAP as part of its biennial LAP revision process.

Proposed Changes to SB 318:

Suggested Legislative Amendments: Based on NDOW's experience as it pertains to developing a Language Access Plan (LAP) in accordance with SB 318 the following revisions to SB318 and the associated costs to fully realize this LAP in practice are as follows:

Proposed Changes to SB 318:

- The Department does not deem it appropriate to request a customer, client, or member of the public to share whether they are a refugee or not with Department staff. This information does not help the Department more effectively provide meaningful, timely language services.
- The Department does not deem it appropriate to request a customer, client, or member of the public to share with Department staff whether or not they are indigenous. This information does not help the Department more effectively provide meaningful, timely language services.
- The Department requests that if state agency staff are required to attend cultural competency training that the State of Nevada provide said training to the Department free of charge.

Estimated costs to implement NDOW LAP as currently proposed:

Funding for State Language Access Plans was made available through *Assembly Bill 480 of the 2023 Legislative Session*. After this funding was made available, the Department identified essential information to be translated which we deem "vital documents". These are essential for public safety. All other identified documents and publications are a high priority for translation to help the Department best serve LEP individuals. NDOW's FY2025-2026 funding request below is for or both vital and high priority documents. Upon the biennial review of Department's Language Access Plan, the next biennium's costs will be established.

NDOW Website + Document Translation Costs

- PDF or Word Documents cost \$0.10 per word for translation using the State's contracted vendor, Language Link.
 - The Department is requesting \$400 in yearly costs for annual translation services.

- Website
 - NDOW has removed the cost for website translation since the initial version of our Language Access Plan. The Department will continue to use the Google Translate Widget suffices as adequate translation.

NDOW Publication Translation Costs

NDOW has four publications per year. The cost to translate and print each publication will total \$13,000. The total cost per year would be about \$52,000. Department publications are not considered “vital” documents. However, the Department recognizes that these publications have helpful information to customers and would like to translate these documents if funding allows.

NDOW In-Person and Over the Phone Language Services

- In-person and Over the Phone Language Services generally cost about \$85/per hour with a one hour minimum. NDOW records show that only two people during the month of May requested translation services over the phone. NDOW believes we can recover those costs if and when needed.

NDOW Client Tracking System

NDOW does not currently have a client tracking system developed to capture and track total LEP clients served, total indigenous served, total refugees served, language preferences of individuals, literacy level of individuals, and/or the services/programs these groups of individuals are accessing.

- Estimated cost to develop and implement a new client tracking system - \$150,000
- Estimated annual maintenance / training costs - \$15,000 per year

Estimated Costs for Implementation of the Nevada Department of Wildlife’s Implementation of SB 318		
Service Provided	Up-front Cost in Dollars	Annual Cost in Dollars
Vital Documents	3,838	200
Remainder of “High Priority” Documents	5,840	200
Translation and Production of Department Publications (Regulations)	(start in FY26)	52,000
Development of New Client Tracking System	150,000	15,000
Total Cost	159,678	67,400

Total Up Front Costs - \$159,678

Total Annual Costs - \$67,400

The Department has built in a 15% contingency in the requested Language Access Plan Work Program for unforeseen challenges, which brings the total ask for FY25 and FY26 to \$261,139.