

NEVADA DEPARTMENT OF MOTOR VEHICLES



Language Access Plan

555 Wright Way, Carson City Nevada 89711

FY 2023

Nevada Department of Motor Vehicles Language Access Plan

POLICY/PROCEDURE NO:	SUBJECT: Nevada DMV Language Access Plan	EFFECTIVE DATE: 9/8/2022
AFFECTS:	APPROVED BY:	DATE:
<input type="checkbox"/> ASD	<i>Ethany Musselman</i>	Sep 13, 2022
<input type="checkbox"/> CED	<u><i>J.D. Decker</i></u> J.D. Decker (Sep 9, 2022 09:19 PDT)	Sep 9, 2022
<input type="checkbox"/> CSD	<u><i>Shauna Bakkedahl</i></u> Shauna Bakkedahl (Sep 13, 2022 12:59 PDT)	Sep 13, 2022
<input type="checkbox"/> FSD	<u><i>Robin A. Allender</i></u> Robin A. Allender (Sep 8, 2022 16:29 PDT)	Sep 8, 2022
<input type="checkbox"/> MCD	<u><i>Michael Xavier</i></u> Michael Xavier (Sep 13, 2022 11:27 EDT)	Sep 13, 2022
<input type="checkbox"/> RPM	<u><i>Molly Lennon</i></u> Molly Lennon (Sep 9, 2022 09:00 PDT)	Sep 9, 2022
<input type="checkbox"/> MVIT	<i>Yvonne Young-Brown</i>	Sep 13, 2022

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Language Access Plan

1. Purpose and Authority

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. "

NV DMV is committed to compliance with SB318 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.

On August 11, 2000, President William J. Clinton signed Executive Order 13166 "Improving Access to Services for Persons with Limited English Proficiency" which requires recipients of federal funding to examine the services they provide, to identify any need for services to LEP individuals, and to develop and implement a system to provide those services so LEP persons can have meaningful access. This Executive Order states individuals who do not speak English well and who have limited ability to read, write, speak, or understand English are entitled to language assistance under Title VI of the Civil Rights Act of 1964 with respect to a particular type of service, benefit, or encounter. These individuals are referred to as being limited in their ability to speak, read, write, or understand English, hence the designation, "LEP" or Limited English Proficient. The term LEP refers to any person aged five (5) and older who reported speaking English less than "very well" as classified by the U.S. Census Bureau. LEP has nothing to do with citizenship status. It applies to U.S citizens, documented non-citizens, and undocumented non-citizens.

Executive Order 13166 further directs that all such guidance documents be consistent with the compliance standards and framework detailed in the Department of Justice's (DOJ's) Policy Guidance entitled "Enforcement of Title VI of the Civil Rights Act of 1964-- National Origin Discrimination Against Persons with Limited English Proficiency." (U.S. Department of Justice Policy Guidance Document dated August 16, 2000, Federal Register Vol. 65, No. 159, Page #50123-01 General LEP Guidance).

Lau v. Nichols, 414 U.S. 563, 569 (1974): The Supreme Court, in Lau v. Nichols, 414 U.S. 563 (1974), interpreted regulations promulgated by the former Department of Health, Education, and Welfare, including a regulation like that of DOJ, 45 CFR 80.3(b)(2), to hold that Title VI prohibits conduct that has a disproportionate effect on LEP persons because

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such conduct constitutes national origin discrimination. In *Lau*, a San Francisco school district that had a significant number of non-English speaking students of Chinese origin was required to take reasonable steps to provide them with a meaningful opportunity to participate in federally funded educational programs. "The failure of the San Francisco school system to provide English language instruction to approximately 1,800 students of Chinese ancestry who do not speak English, or to provide them with other adequate instructional procedures, denies them a meaningful opportunity to participate in the public educational program and thus violates 601 of the Civil Rights Act of 1964...." The U.S. Supreme Court decided the failure of the San Francisco school system to provide language accommodation to non-English speaking students violated Title VI.

The U.S. Department of Justice (DOJ) (67 Fed. Reg. 41455, 41457, 41471 (June 18, 2002) - adopted final guidance, "Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons". The DOJ Guidance outlines four factors that should be considered to determine when language assistance might be required to ensure such meaningful access, and it identifies cost-effective measures to address those language needs.

U.S. Department of Transportation (Federal Register, Volume 70, No. 239, 74087-74100) issued LEP guidance on December 14, 2005, entitled "*Policy Guidance Concerning Recipients Responsibilities to Limited English Proficient (LEP) Persons*" concerning services and policies by recipients of federal financial assistance. The guidance is based on the prohibition against national origin discrimination in Title VI of the Civil Rights Act of 1964, as it affects LEP persons.

The purpose of this document is to establish an effective plan and protocol for NV DMV personnel to follow when providing services to, or interacting with, individuals who have limited English proficiency. Following this plan and protocol is essential to the success of NV DMV's vision and mission:

Vision: National Leader in DMV services

Mission: Provide efficient motor vehicle solutions for the identification, licensure, and protection of all we serve.

DMV Transformation Effort

NV DMV is building the DMV of the future! The Nevada DMV will be moving most of its services online within the next few years and rebuilding our customer service and IT platforms.

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2. Acronyms and Definitions

Acronym	Definition
ADA	Americans with Disabilities Act
CDL	Commercial Driver’s License
CFR	Code of Federal Regulations
DTE	DMV Transformation Effort
DOJ	Department Of Justice
FMCSA	Federal Motor Carrier Safety Administration
ID	Identification
LAP	Language Access Plan
LEP	Limited English Proficient
NRS	Nevada Revised Statute
NV DMV	Nevada Department of Motor Vehicles
SDLA	State Driver Licensing Agency
SB	Senate Bill
TBD	To be Determined

3. General Policy

NV DMV recognizes that the population eligible to receive its services includes LEP individuals. It is the policy of NV DMV to ensure meaningful access to LEP individuals. NV DMV’s primary duties are to license Nevada’s 2.3 million drivers and ID card holders and register more than 2.7 million vehicles while maintaining the integrity and privacy of DMV records. NV DMV adopts the following policies and procedures to ensure that LEP individuals can gain equal access to NV DMV’s services and be communicated with effectively. This plan applies to all NV DMV’s activities, programs and services including, but not limited to:

- Drivers Licenses/Identification Cards
- Vehicle Registration
- Vehicle Titles
- Motor Carrier
- Movement Permits
- Business Licensing
- Emission Control Program
- Website and Online Services
- Driver Education and Testing
- Investigate Consumer Complaints

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It is NV DMV's policy to grant access to activities, services, or programs to every person regardless of their ability to speak, understand, read, or write English. NV DMV intends to take all reasonable steps to provide LEP individuals with meaningful access to the agency's programs, activities, and services. NV DMV seeks to reduce barriers by increasing its capacity to deliver services and benefits to people in their preferred languages.

NV DMV has developed this Language Access Plan (LAP) to assist the divisions and offices in their efforts to ensure information and services are accessible to LEP individuals by providing guidance on translation, interpretation, and outreach services for LEP individuals seeking access to NV DMV programs. NV DMV activities* are to be conducted without regard to an applicant's race, color, national origin, sex, age, disability, income-level, or LEP and include all application and testing activities (including driver's manuals) conducted by NV DMV.

* LEP requirements apply to all motorist licensure and motor vehicle registration activities **except** for the following two situations:

- (1) Commercial Driver's License (CDL) Knowledge Test (governed by 49 CFR 383.133) an interpreter may not interpret the knowledge test for a CDL applicant; and
- (2) CDL Skills Test-By FMCSA regulation, as interpreter may not interpret during the skills test.

NV DMV is committed to equity and will take all reasonable steps to provide LEP individuals with meaningful access to all its services, programs, and activities. NV DMV does not turn away any LEP individual who brings their family member or friend to provide language assistance to promote and bridge any communication gap that may arise for the purpose of providing the LEP individual with the service they are seeking within an agency.

NV DMV acknowledges that SB318, once implemented, funding is received and DTE is complete, will require the following:

- NV DMV staff will, at the initial points of contact, have the specific duty to identify and record language needs.
- The agency, rather than the LEP individual, would bear the responsibility for providing appropriate language services, regardless of the LEP individual's preferred language, at no cost to the LEP individual within a reasonable time.
- No NV DMV staff may suggest or require that an LEP individual provide an interpreter in order to receive agency services.

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LAP Oversight

NV DMV's Language Access Coordinator (TBD once funding is received and DTE is complete) will:

- Oversee the implementation of this LAP
- Maintain future iterations of the LAP
- Coordinate all training requirements with the Training Officer
- Keep records (tracking preferred languages of LEP clients)
- Collaborate with community-based organizations that serve LEP
- Solicit public comment for developed LAP and each revision thereof

NV DMV's Training Officer is responsible for:

- Training on the LAP at initial rollout
- Training for all new staff (integrated with onboarding)
- Subsequent biennial training

NV DMV's Managers and Divisional Administrators are responsible for:

- LAP decision making
- Assist and support the Language Access Coordinator with the implementation and oversight of the LAP within their respective programs
- Communication and assisting the Training Officer

4. Profile of NV DMV's LEP Clients

Currently, NV DMV does not have the functionality to collect English proficiency level, preferred language, and literacy level of LEPs and, the number and percentage of LEPs who are indigenous and who are refugees. Forms and document revisions would be necessary to meet the required reporting elements outlined in SB318. NV DMV will prepare for tracking such statistics after our DTE is complete (currently anticipated to be October 2025) and funding has been received. However, our staff (in all divisions) works diligently to provide effective communication among our LEP clients to provide meaningful, timely access to our services and programs.

NV DMV is committed to exploring additional methods to be proactive and responsive to the accessibility needs of the local LEP population. The U.S. DOT Policy Guidance gives NV DMV substantial flexibility in determining what language assistance is appropriate based on an assessment of the following four factors:

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Factor 1-Demographics:

Identify the number or proportion of LEP persons in the NV DMV service areas who may be served or are likely to encounter an NV DMV program, activity, or service.

According to the U.S. Census Bureau 2020 American Community Survey 5-year estimates, Nevada total population is 2,846,140.

In assessing the population by ethnic background, the Hispanic/Latino population ranks highest with reported representation at 593,610 (20.86%) persons, of which 38.7% speak Spanish at home.

With regard to the Hispanic/Latino population, 363,895 (61.3%) persons reported that they spoke "English only or speak English very well" and 229,715 (38.7%) persons reported that they spoke English "less than very well."

All individuals who have identified themselves as speaking English less than "very well", totaling 320,840 (11.3%), are considered to be limited English proficient based on their limited ability to read, write, speak, or understand English. This limitation makes it difficult for them to have meaningful access to programs that may be offered by the department.

Since Spanish is currently the largest group of LEP individuals in Nevada, NV DMV's initial focus has been this community. The second largest group of LEP individuals in Nevada speaks Tagalog. Language assistance will be made available to other limited English-speaking individuals as the need for services arise.

Below is a data table from the U.S. Census 2020 for the Nevada counties:

County	Language	Percent	Speak English less than "very well"	Total Population
Carson	Spanish	6.52%	3,403	52,223
Carson	Other Indo-European	0.54%	281	
Carson	Asian / Pacific Island	0.38%	196	
Carson	Other	0.10%	51	
Churchill	Spanish	4.79%	1,102	23,027
Churchill	Other Indo-European	0.04%	10	
Churchill	Asian / Pacific Island	0.38%	87	
Churchill	Other	0.10%	23	

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County	Language	Percent	Speak English less than "very well"	Total Population
Clark	Spanish	9.16%	191,454	2,089,863
Clark	Other Indo-European	0.70%	14,638	
Clark	Asian / Pacific Island	2.69%	56,211	
Clark	Other	0.46%	9,596	
Douglas	Spanish	2.70%	1,265	46,833
Douglas	Other Indo-European	0.36%	169	
Douglas	Asian / Pacific Island	0.43%	203	
Douglas	Other	0.02%	10	
Elko	Spanish	4.21%	2,060	48,938
Elko	Other Indo-European	0.12%	60	
Elko	Asian / Pacific Island	0.12%	59	
Elko	Other	0.16%	76	
Esmeralda	Spanish	7.52%	76	1,011
Eureka	Spanish	0.53%	9	1,701
Humboldt	Spanish	6.03%	943	15,630
Humboldt	Other Indo-European	0.25%	39	
Humboldt	Asian / Pacific Island	0.40%	62	
Humboldt	Other	0.23%	36	
Lander	Spanish	6.24%	329	5,271
Lander	Other	0.06%	3	
Lincoln	Spanish	0.76%	38	4,993
Lincoln	Other Indo-European	0.20%	10	
Lincoln	Asian / Pacific Island	0.62%	31	
Lyon	Spanish	3.23%	1,706	52,745
Lyon	Other Indo-European	0.17%	88	
Lyon	Asian / Pacific Island	0.27%	143	
Lyon	Other	0.10%	53	
Mineral	Asian / Pacific Island	0.32%	14	4,333
Mineral	Spanish	0.85%	37	
Nye	Spanish	3.63%	1,579	43,445
Nye	Other Indo-European	0.17%	74	
Nye	Asian / Pacific Island	0.57%	247	
Nye	Other	0.01%	6	
Pershing	Spanish	5.41%	341	6,308
Pershing	Other Indo-European	0.22%	14	
Pershing	Asian / Pacific Island	0.78%	49	

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County	Language	Percent	Speak English less than "very well"	Total Population
Storey	Spanish	0.28%	11	3,914
Storey	Other Indo-European	0.23%	9	
Washoe	Spanish	5.75%	25,102	436,794
Washoe	Other Indo-European	0.52%	2,254	
Washoe	Asian / Pacific Island	1.27%	5,559	
Washoe	Other	0.16%	720	
White Pine	Spanish	2.85%	260	9,111
White Pine	Other Indo-European	0.40%	36	
White Pine	Asian / Pacific Island	0.05%	5	
White Pine	Other	0.03%	3	

US Census Four Major Language Groups:

- Spanish includes Spanish, Spanish Creole, and Latino.
- Other Indo-European languages include most languages of Europe and the Indic languages of India. These include the Germanic languages, such as German, Yiddish, and Dutch; the Scandinavian languages, such as Swedish and Norwegian; the Romance languages, such as French, Italian, and Portuguese; the Slavic languages, such as Russian, Polish, and Serbo-Croatian; the Indic languages, such as Hindi, Gujarati, Punjabi, and Urdu; Celtic languages; Greek languages; Baltic languages; and Iranian languages.
- Asian and Pacific Island languages include Tagalog; Chinese; Korean; Japanese; Vietnamese; Hmong; Khmer; Lao; Thai; Tagalog or Pilipino; the Dravidian languages of India, such as Telugu, Tamil, and Malayalam; and other languages of Asia and the Pacific, including the Philippine, Polynesian, and Micronesian languages.
- All Other languages include Uralic languages, such as Hungarian; the Semitic languages, such as Arabic and Hebrew; languages of Africa; native North American languages, including the American Indian and Alaska native languages; and indigenous languages of Central and South America.

Factor 2-Frequency:

The frequency with which LEP individuals come in contact with a NV DMV program, activity, or service.

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NV DMV currently does not track the frequency in which DMV employees come in contact with LEP individuals. However, each DMV Division makes every effort to immediately and effectively communicate when an LEP individual needs assistance with any of our programs, activities or services.

Currently in the DTE, NV DMV has monitored contacts with LEPs to give our agency a projection of common languages spoken by LEP persons encountered by NV DMV staff to provide projected language service needs.

Factor 3-Nature and Importance:

NV DMV's most critical services are those related to driver licensing and identification for non-licensed individuals as well as vehicle registration and titling. The NV DMV anticipates that staff is most likely to encounter LEP individuals through testing sites, office visits, DMV's website, kiosks, telephone conversations, driver's license notifications, vehicle licensing sites, and headquarters. NV DMV will build towards monitoring use by LEP persons to determine whether some particular motor vehicle issues are more important than others to the LEP population.

Factor 4-Available Resources and Costs:

U.S. Department of Transportation Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons published in the Federal Register: December 14, 2005 (Volume 70, Number 239) states:

"A recipient's level of resources and the costs imposed may have an impact on the nature of the steps it should take in providing meaningful access for LEP persons. Smaller recipients with more limited budgets are not expected to provide the same level of language services as larger recipients with larger budgets. In addition, "reasonable steps" may cease to be reasonable where the costs imposed substantially exceed the benefits. Recipients should carefully explore the most cost-effective means of delivering competent and accurate language services before limiting services due to resource concerns."

Based on this guidance, NV DMV has reviewed its resources and determined that, NV DMV will translate determined vital documents into Spanish and/or Tagalog at this time. NV DMV may also provide translation and interpreter services for other languages on a case-by-case basis.

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5. NV DMV Language Access Services and Procedures

NV DMV's Language Access Plan will serve as the design for which NV DMV intends to build from to provide LEPs meaningful and timely access to DMV activities, programs, and services with reasonable efforts. Apart from CDL testing (knowledge test and skills test), NV DMV ensures that all language service providers are fully competent to provide these services.

According to [49 CFR 383.133](#), which states in part "Each knowledge test must be valid and reliable so as to ensure that [driver applicants](#) possess the knowledge required under [§ 373.111](#). The knowledge tests may be administered in written form, verbally, or in automated format and can be administered in a foreign language, provided no interpreter is used in administering the test."

Upon implementation of this LAP, and once DTE is complete and funding is received, NV DMV will:

- Provide language access services in the LEP's preferred language
- Identify and record the preferred language at the beginning of interaction
- Post Brochures of availability of language services
- Participate in Outreach events

In accordance with the Americans with Disabilities Act (ADA) of 1990 and the Americans with Disabilities Act Amendments Act (ADAAA) of 2008, NV DMV will not discriminate against any individual based on their disability and will make reasonable accommodations to ensure equal opportunity is given to access programs and services. LEP individuals who are hearing impaired may request assistance. NV DMV is committed to providing LEP clients full access to DMV services and programs and requires its staff to follow the procedures described below to ensure there is meaningful access to available language services. Moreover, once DTE is complete and funding is received, NV DMV is committed to 100% compliance with these procedures and will provide staff with the training described below to help ensure that all staff are familiar with these procedures and recognize their importance to NV DMV's mission.

Oral/Sign Language Services

NV DMV is sensitive to the needs of the hearing impaired. When a client presents the need for a sign language interpreter, NV DMV will tentatively schedule an appointment date and time with an approved sign language interpreter and the hearing-impaired customer. Trained and competent [Sign Language Interpreters](#) are available through a Nevada State Purchasing Master Service Agreement.

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NV DMV does not currently have an oral language service outside of those staff members who are bilingual. However, upon implementation and funding of this LAP (and upon DTE completion), NV DMV will secure an Oral Language Service to augment the communication with LEPs more efficiently.

It is commonly understood in the CDL community that interpreters are not allowed in administering the tests. An interpreter is a person who can convert oral messages from one language to another, often in real time. Therefore, the allowance in the above regulation to provide the knowledge test in a foreign language does not conflict with the regulatory language prohibiting interpreters. Providing an individual who can translate the written text of the general knowledge test into ASL (or other sign language) will not conflict with the prohibition against interpreters. Therefore, the general knowledge test may be administered to an applicant in sign language.

State Driver Licensing Agencies (SDLAs) should follow the guidelines below when implementing this guidance:

- SDLAs should ensure the applicant has a valid, unexpired hearing exemption from the FMCSA.
- SDLAs should seek the guidance of their own counsel for further consideration of applicable civil rights laws and regulations.
- SDLAs should always provide the translation, whether it be live or by a video program. State provided sign-language practitioners reduce the potential for fraud.

Translating the general knowledge test into ASL is a reasonable accommodation for applicants that are deaf or hard of hearing and who have a valid, unexpired hearing exemption.

Written Language Services

NV DMV recognizes that written language services ensure LEPs have access to necessary program information and services in written form. To accomplish this, NV DMV has established a list of vital documents as well as procedures for identifying vital communications with their customers.

Translation services will be provided by available, trained, competent and approved staff or contractors and trained and competent translators through an available Nevada State Purchasing Master Service Agreement for Translation/Interpreters.

NV DMV identifies vital documents as all written communications that may have consequences for an LEP regarding access to services and activities. Vital documents for each program or service will be made readily available and translated into the “safe

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harbor” languages. Vital documents are made available through paper and electronic communications (where applicable and where “wet signatures” are not required). NV DMV has identified the following vital documents:

- DMV 021 Restricted License Info Application
- Driver Manual online (Spanish or English)

Additionally, the following vital document has been translated into Spanish and Tagalog languages as the result of the Voting Rights Act (<https://www.justice.gov/crt/about-language-minority-voting-rights>):

- DMV 002 Application for Driving Privilege or ID Card

Community Outreach:

NV DMV is committed to ensuring that the larger LEP community is aware of and able to access all available language services. In doing so, NV DMV will take reasonable steps to publicize the availability of its language services in the community. Additionally, NV DMV will provide notification of its services at all relevant points of contact and resources for its staff to improve their cultural competency and ability to work with diverse groups.

NV DMV will conduct outreach activities across the State of Nevada that will encompass all demographics and will be driven by funding, state law and federal regulations depending on the activity. NV DMV outreach and engagement will encompass in-person, virtual, and written materials to ensure outreach materials are available in “safe harbor” languages; “I-Speak” cards are available; and oral/sign language interpreters are considered. The details of the language assistance are TBD, based on the DTE’s conclusive findings with the new program solution.

Cultural Competency Resources: NV DMV will provide the following resources to its staff to improve their ability to work with diverse groups:

- Cultural Literacy Strategies
- Outreach and Public Awareness Strategies

6. NV DMV Staff Training and Recruitment

NV DMV strives to provide relevant and current communications to its staff in the fulfillment of its vision and mission. Towards that end, NV DMV is committed to improving language access services and resources with qualified and trained staff.

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Training

NV DMV will ensure that staff are familiar with and trained in the language access policies and procedures that will be created. Those LAP procedures will be included in:

- New hire orientation
- Position specific training for those working with the public
- Cultural competency training will be developed and incorporated with regular training requirements
- Leadership and management presentations

Recruitment

NV DMV follows DHRM policies and procedures for all recruitments to ensure fair and equitable hiring practices. Upon implementation and funding, NV DMV will evaluate the need for recruiting dual-role interpreters to meet appropriate language access resources to serve our LEP clients.

NV DMV will further work toward ensuring that any dual-role interpreters used by the department, meet the qualifications as certification becomes available to State of Nevada employees.

The State of Nevada Human Resources Datawarehouse does not currently capture data to identify NV DMV staff that are bilingual interpreters or translators, and the language(s) spoken. However, an informal inventory (as of May 2022) of the language services NV DMV provides in most areas includes Spanish. NV DMV also provides (in limited areas only) language services in Tagalog, Russian and sign language. Therefore, enhancements to provide language services (oral interpretation and written translation) will be based on legislative-approved budget authority in the next session, and after the agency has completed their DTE.

The Nevada State Purchasing provides master service agreements that can support bilingual temporary staffing needs. NV DMV has included those projected budget needs within this LAP.

7. Implementing DMV's LAP

Implementation Timelines

NV DMV has prepared this LAP to identify an inventory of what services NV DMV currently can provide to LEP clients as well as those limitations and barriers for fully complying with SB318. The implementation timelines will assist NV DMV in efforts to move toward compliance, upon funding availability and DTE completion:

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<u>Timeline</u>	<u>Description of Activity</u>
Upon Funding	Hire Language Access Coordinator
Within six months of hiring the LAC	Initial LAP Training of Leadership
Within 12 months of hiring the LAC	Initial LAP Training of Staff
Estimated to be October 2025	Begin Data Collection of LEP preferred languages

Evaluation

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

- Review of vital documents for any additions and/or revisions
- Create formal complaint forms regarding language access services
- Conduct periodic quality assurance reviews to ensure LAP compliance
- Solicit and monitor feedback from the public (and stakeholders)

8. Declared Emergency

NV DMV recognizes that the communication with customers and employees is essential for preparing, responding, and recovering during a declared emergency. In accordance with OSHA 1910.38, 1910.157, 1910.165, and SAM 0521 Safety and Health Program, the DMV establishes an emergency action plan for the safety of our employees and customers (including LEP individuals). In the event of an emergency evacuation, the following procedures shall be followed in addition to facility-specific evacuation plans. Personal safety and health take priority over the prevention of damage to property. NV DMV acknowledges that the safety of LEP individuals could be at risk if they are unable to access emergency notifications in a language they can understand. NV DMV will ensure timely and meaningful access to LEP individuals in their preferred language during a declared emergency as follows:

- NV DMV employees and contractors will follow the DMV 6.4.1 Emergency Evacuation Policy
- NV DMV will make reasonable efforts to ensure all emergency notifications or information will be translated
- NV DMV emergency notifications via in-person or video broadcast will include sign language interpreters.

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9. Evaluation of and Recommendations for NV DMV’s Language Access Plan

Budget Needs:

According to NRS 232.0081, section 4(c), NV DMV is to include within our LAP, any funding necessary to carry out a language access plan, including, without limitation, any additional funding necessary to meet the needs of persons with limited English proficiency served by the agency as identified pursuant to paragraph (f) of subsection 2, in the proposed budget for agency submitted pursuant to NRS 353.210.

Therefore, a fiscal impact for NV DMV implementation of this LAP and compliance would need to be addressed in special consideration of the 82nd Legislative Session or in the following 83rd Legislative Session.

The following preliminary fiscal impact has been developed using the data from staffing resources (FTE and equipment), projected translation services and projected oral interpreter services for FY 26/27:

Line Item	FY26 Amount	FY27 Amount
TBD (FTE-PO3) FY 26	\$103,081	103,858
Equipment/Expenses	\$5,472	0
Interpreter Services (estimated for one year)	\$114,477	\$114,477
Translation Services (estimated for one year)	\$46,150	\$46,150
Total	\$269,180	\$264,485

Legislative Recommendations:

NV DMV recommends the following revisions to NRS 232.0081 or other legislation:

1. Further define the parameters for English proficiency level
 - a. Suggest question to be whether the client speaks English well (yes or no)
2. Align existing federal regulations and NRS 232.0081
3. Further define “literacy level”
 - a. Suggest question to be whether the client understands English well (yes or no) as clients may not wish to disclose such information (may be subjective)
4. Define dual-role interpreter to show how they are tested and trained (who conducts this?)

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5. List the number and percentage of LEPs who are indigenous and who are refugees. This should be optional as clients may not wish to disclose such information.

NV DMV Language Access Plan 2022 ONA Format FINAL #2

Final Audit Report

2022-09-13

Created:	2022-09-08
By:	Vickie Coll (VCCOLL@dmv.nv.gov)
Status:	Signed
Transaction ID:	CBJCHBCAABAAw0cx8bS0dBjiJFpmGu8Cw_kLLOoMgb8x

"NV DMV Language Access Plan 2022 ONA Format FINAL #2" History

-  Document created by Vickie Coll (VCCOLL@dmv.nv.gov)
2022-09-08 - 11:09:08 PM GMT- IP address: 167.154.4.101
-  Document emailed to asmith@dmv.nv.gov for signature
2022-09-08 - 11:14:06 PM GMT
-  Document emailed to jddecker@dmv.nv.gov for signature
2022-09-08 - 11:14:06 PM GMT
-  Document emailed to rallender@dmv.nv.gov for signature
2022-09-08 - 11:14:07 PM GMT
-  Document emailed to Shauna Bakkedahl (spbakkedahl@dmv.nv.gov) for signature
2022-09-08 - 11:14:07 PM GMT
-  Document emailed to Michael Xavier (mcxavier@dmv.nv.gov) for signature
2022-09-08 - 11:14:08 PM GMT
-  Document emailed to mjlennon@dmv.nv.gov for signature
2022-09-08 - 11:14:08 PM GMT
-  Document emailed to Suzie Block (sblock@dmv.nv.gov) for signature
2022-09-08 - 11:14:08 PM GMT
-  Email sent to jddecker@dmv.nv.gov bounced and could not be delivered
2022-09-08 - 11:14:17 PM GMT
-  Email viewed by Suzie Block (sblock@dmv.nv.gov)
2022-09-08 - 11:14:23 PM GMT- IP address: 167.154.4.101

-  Email viewed by rallender@dmv.nv.gov
2022-09-08 - 11:20:37 PM GMT- IP address: 167.154.129.201
-  Signer rallender@dmv.nv.gov entered name at signing as Robin A. Allender
2022-09-08 - 11:29:52 PM GMT- IP address: 167.154.129.201
-  Document e-signed by Robin A. Allender (rallender@dmv.nv.gov)
Signature Date: 2022-09-08 - 11:29:54 PM GMT - Time Source: server- IP address: 167.154.129.201
-  Vickie Coll (VCCOLL@dmv.nv.gov) replaced signer jddecker@dmv.nv.gov with jdecker@dmv.nv.gov
2022-09-08 - 11:35:18 PM GMT- IP address: 167.154.4.101
-  Document emailed to jdecker@dmv.nv.gov for signature
2022-09-08 - 11:35:18 PM GMT
-  Email sent to jdecker@dmv.nv.gov bounced and could not be delivered
2022-09-08 - 11:35:32 PM GMT
-  Email viewed by mjlennon@dmv.nv.gov
2022-09-09 - 4:00:23 PM GMT- IP address: 167.154.4.101
-  Signer mjlennon@dmv.nv.gov entered name at signing as Molly Lennon
2022-09-09 - 4:00:41 PM GMT- IP address: 167.154.4.101
-  Document e-signed by Molly Lennon (mjlennon@dmv.nv.gov)
Signature Date: 2022-09-09 - 4:00:43 PM GMT - Time Source: server- IP address: 167.154.4.101
-  Email viewed by jdecker@dmv.nv.gov
2022-09-09 - 4:18:14 PM GMT- IP address: 167.154.129.201
-  Signer jdecker@dmv.nv.gov entered name at signing as J.D. Decker
2022-09-09 - 4:19:29 PM GMT- IP address: 167.154.129.201
-  Document e-signed by J.D. Decker (jdecker@dmv.nv.gov)
Signature Date: 2022-09-09 - 4:19:31 PM GMT - Time Source: server- IP address: 167.154.129.201
-  Vickie Coll (VCCOLL@dmv.nv.gov) replaced signer Suzie Block (sblock@dmv.nv.gov) with Yvonne Young (yyoung@dmv.nv.gov)
2022-09-12 - 10:21:37 PM GMT- IP address: 167.154.4.101
-  Document emailed to Yvonne Young (yyoung@dmv.nv.gov) for signature
2022-09-12 - 10:21:37 PM GMT
-  Vickie Coll (VCCOLL@dmv.nv.gov) replaced signer asmith@dmv.nv.gov with Bethany Musselman (bmusselman@dmv.nv.gov)
2022-09-12 - 10:22:29 PM GMT- IP address: 167.154.4.101

 Document emailed to Bethany Musselman (bmusselman@dmv.nv.gov) for signature

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 Email viewed by Yvonne Young (yyoung@dmv.nv.gov)

2022-09-12 - 10:42:46 PM GMT- IP address: 167.154.4.101

 Email viewed by Bethany Musselman (bmusselman@dmv.nv.gov)

2022-09-13 - 3:04:04 PM GMT- IP address: 167.154.4.101

 Document e-signed by Yvonne Young (yyoung@dmv.nv.gov)

Signature Date: 2022-09-13 - 3:17:49 PM GMT - Time Source: server- IP address: 167.154.4.101

 Email viewed by Michael Xavier (mcxavier@dmv.nv.gov)

2022-09-13 - 3:27:16 PM GMT- IP address: 174.216.179.230

 Document e-signed by Michael Xavier (mcxavier@dmv.nv.gov)

Signature Date: 2022-09-13 - 3:27:58 PM GMT - Time Source: server- IP address: 174.216.179.230

 Document e-signed by Bethany Musselman (bmusselman@dmv.nv.gov)

Signature Date: 2022-09-13 - 3:46:26 PM GMT - Time Source: server- IP address: 167.154.4.101

 Email viewed by Shauna Bakkedah (spbakkedah@dmv.nv.gov)

2022-09-13 - 7:59:12 PM GMT- IP address: 167.154.4.101

 Document e-signed by Shauna Bakkedah (spbakkedah@dmv.nv.gov)

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 Agreement completed.

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