



NEVADA GAMING COMMISSION

1919 College Parkway, P.O. Box 8003

Carson City, Nevada 89702

(775) 684-7750

STEVE SISOLAK
Governor

NICOLE RUPERT
Executive Secretary

HON. JENNIFER TOGLIATTI (RET), *Chair*
ROSA SOLIS-RAINEY, *Member*
STEVEN COHEN, *Member*
OGONNA M. BROWN, *Member*
BEN KIECKHEFER, *Member*

LANGUAGE ACCESS PLAN NRS 232.0081

I. Purpose and Authority

Senate Bill No. 318 of the 81st Session of the Nevada Legislature (SB318) and the federal guidance for compliance with Title VI of the Civil Rights Act of 1964 both resolve that language should not be a barrier to accessing governmental programs and services. The preamble of SB318 establishes that “[p]ersons with limited English proficiency require and deserve meaningful, timely access to government services in their preferred language.” Moreover, the bill explicitly states 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.

The Nevada Gaming Commission (Commission) is committed to complying with NRS 232.0081 and Title VI of the Civil Rights Act of 1964, 2 C.S. § 561 et seq. (Act 172 of 2006) to ensure meaningful access to government services and programs for individuals with limited English proficiency. The purpose of this document is to establish an effective plan for employees of the Commission to follow when providing services to, or interacting with, individuals who have limited English proficiency. Following this Plan is essential to the success of the Commission’s mission to govern Nevada’s gaming industry through strict regulation of all persons, locations, practices, associations, and related activities of the gaming industry.

****The Commission notes that this specific version of its language access plan is a draft and may not be the final version of the Plan implemented by the Commission.****

II. General Policy

The Commission recognizes that the population eligible to work in Nevada's gaming industry includes individuals with limited English proficiency. It is the policy of the Commission to ensure meaningful access to individuals with limited English proficiency. The Commission will implement this Language Access Plan (Plan) to ensure that individuals with limited English proficiency can gain equal access to the industry that the Commission regulates and communicate effectively with the Commission. This Plan applies to all the Commission's programs and services, including, without limitation, 1) an appeal of an objection to registration as a gaming employee; and 2) the casino/patron dispute process.

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

To effectuate this Plan, the Commission endorses the following policies:

- The Commission is committed to equity and will take all reasonable steps to provide individuals with limited English proficiency with meaningful access to all of its services, programs, and activities.
- The Commission, rather than the individual with limited English proficiency, is responsible for providing appropriate language services, regardless of the individual's preferred language, at no cost to the individual.
- Employees of the Commission who regularly interact with the public have a duty to identify and record language needs of individuals who indicate the need for language services.
- Use of informal interpreters, including, without limitation, a family member or friend of the person seeking services is prohibited. Minor children are prohibited from acting as interpreters.
- Employees are prohibited from suggesting or requiring an individual with limited language proficiency provide his or her own interpreter in order to receive a service from the Board.

Nevada Gaming Commission Language Access Coordinators

Tricia Bookhart
Human Resources Manager
702-486-2223
tbookhart@gcb.nv.gov

Judy Iannacchino
Training & Diversity Officer
702-486-2099
jiannacchino@gcb.nv.gov

Michael Morton
Senior Policy Counsel
775-684-7792
mmorton@gcb.nv.gov

*Pursuant to subsection 1 of NRS 463.027, the Nevada Gaming Control Board (Board) will furnish administrative services related to language access to the Commission.

III. Profile of Clients of the Nevada Gaming Commission

The Commission is committed to tracking the languages preferred for communication among the individuals with limited English proficiency whom the Commission serves, so that the Commission can better provide meaningful, timely access to the Commission's services and programs without regard to any language impediments. The Commission meets this commitment, in part, by utilizing the Board's diverse employees that mirror the global industry that it regulates.

While the Commission does not have any public-facing programs that serve residents of Nevada, the Commission is acutely aware of its statutory duty established in NRS 463.0129 to protect the public – both residents of and visitors to Nevada – by strictly regulating all persons and locations that are given the privilege to participate in Nevada's gaming industry.

Pursuant to NRS 463.335, a person may not be employed as a gaming employee unless the person is registered as a gaming employee by the Board. With approximately 100,000 registered gaming employees in this State, this group of employees is the backbone of the industry that drives the economics of Nevada. Just as Nevada is a preeminent global destination for visitors, it has become just as much of a global destination for those who choose to work in the industry. These individuals seek registration as a gaming employee with the Board only after attaining employment with a licensed gaming establishment. Therefore, this required "service" is only available – or in this case, required – of those who are employed by a gaming licensee and are statutorily defined as a gaming employee (see NRS 463.0157).

The Board has been diligently working through a multi-year technology migration project, which includes a substantial overhaul of the online, public-facing application for gaming employee registrations. As the Board is in the middle of this technology project, the Board will build into the project the collection of the following information from the applicants for registration as a gaming employee: 1) preferred language; 2) status as an indigenous person; and 3) refugee status. Specifically, the data will be collected through the online application process, whereby applicants for registration as a gaming employee will submit this demographic information through the application portal. It will be archived in the portal, and can be accessed by the Employee Registration Unit, Information Technology Section, and language access coordinators listed in Section II.

The Board will furnish the Commission the information collected above as necessary.

IV. Language Access Services and Procedures of the Nevada Gaming Commission

The Commission has secured the language access services described in this section to enable individuals with limited English proficiency to access the Board's information required to become a registered gaming employee or avail themselves of the Board's dispute process. The Commission will also make every reasonable effort to offer these language access services to any member of the public who may be contacting the Commission for any reason.

Oral and Written Language Services

The following employees of the Board have self-identified as having the ability to adequately and competently read, write, or speak a language other than English:

<u>Language</u>	<u>Employee</u>	<u>Division</u>	<u>Read</u>	<u>Write</u>	<u>Speak</u>	<u>Location</u>
Armenian		Audit	x	x	x	LV
		Investigations	x	x	x	LV
Cantonese		Audit			x	LV
		Audit			x	LV
		Audit	x	x	x	LV
		Audit	x	x	x	LV
Chinese		Audit	x	x		LV
		Audit	x	x		LV
		Investigations	x	x	x	LV
French		Audit	x	x	x	RN
		Enforcement	x	x	x	LV
		Enforcement	x	x	x	LV
Ilocano		Audit	x		x	LV
Indonesian		Audit	x	x	x	RN
Japanese		Technology	x	x	x	CC
Korean		Audit	x	x	x	LV
		Audit	x	x	x	LV
		Audit	x	x	x	LV
		Audit	x	x	x	LV

Laotian		Tax and License			x	LV
Mandarin		Audit			x	LV
		Audit	x	x	x	LV
		Audit	x	x	x	LV
Mongolian		Audit	x	x	x	LV
Portuguese		Audit			x	LV
		Technology	x	x	x	LV
Russian		Audit	x	x	x	LV
		Investigations	x	x	x	LV
		Investigations	x	x	x	LV
Spanish		Audit	x	x	x	LV
		Administration	x	x	x	LV
		Administration	x	x	x	LV
		Audit	x	x	x	LV
		Enforcement	x	x	x	LV
		Technology	x	x	x	LV
		Tax and License	x	x	x	LV
		Enforcement	x	x	x	LV
		Enforcement	x	x	x	LV
		Enforcement	x	x	x	LV
		Enforcement	x	x	x	LV
		Enforcement	x	x	x	LV
		Enforcement	x	x	x	LV
		Enforcement	x	x	x	LV
		Audit	x	x	x	LV
		Audit	x	x	x	RN
		Investigations	x	x	x	LV
		Investigations	x	x	x	LV
		Audit	x	x	x	LV
		Audit	x	x	x	LV
		Audit	x	x	x	LV
Tagalog		Audit	x	x	x	LV
		Enforcement	x	x	x	LV
		Investigations	x	x	x	LV
		Investigations	x	x	x	LV
		Enforcement	x	x	x	LV

Thai		Audit	x	x	x	LV
Ukrainian		Investigations	x	x	x	LV
Vietnamese		Enforcement	x	x	x	LV

If an individual who needs oral or written language services seeks to access the registration application or any other services offered by the Commission and cannot be served by the Board's current language access services, the Commission will utilize one of the active statewide contracts for translation and interpreter services offered by the State. The list of current statewide contracts for such services can be found [here](#).

Sign Language Services

If an individual who needs sign language services seeks to access information and services offered by the Commission, the Commission will utilize one of the active statewide contracts for translation and interpreter services offered by the State. The list of current statewide contracts for such services can be found [here](#).

Cultural Competency Resources

In 2022, the Board's Training & Diversity Officer conducted required training for each Board and Commission employee regarding cultural competency, diversity, and inclusion.

V. Implementing the Language Access Services of the Nevada Gaming Commission

The Commission is committed to providing individuals with limited English proficiency full access to its programs. Towards this end, the Commission requires its staff to follow the procedures described below to ensure meaningful access to available language services. The Commission is committed to full compliance with these procedures and will provide staff with the training necessary to ensure that all staff are familiar with these procedures and recognize their importance to the Commission's mission.

Language Access Procedures

The following procedures should be followed to: 1) interact appropriately with individuals with limited English proficiency; 2) inform such individuals of the availability of language services; 3) determine individuals' preferred languages; and 4) record and track such language preferences so that this information can be used throughout interactions with Board and Commission staff.

If, upon the implementation of the new online application for the registration of gaming employees described in Section III, an application for registration as a gaming employee is received that contains information noting that the individual's preferred language is not English, an employee of the Board's Employee Registration Unit should ensure that this individual is provided with the appropriate language services provided by the Board as described in Section IV.

The Board and Commission will use competent bilingual staff who are able to provide services directly to the individual in his or her preferred language without the need for an interpreter. If this direct service is not possible, staff should seek assistance from professional in-person or telephone interpreters by contacting the language access coordinators listed in Section II. The Commission has authorized its staff to provide language services to communicate effectively even when such assistance has not been expressly requested.

Language Access Quality Assurance

The Commission is committed to ensuring that all language service providers it uses are qualified and competent to provide those services. Towards that end, the Board and Commission will be formulating policies and procedures to establish provider qualifications and track performance.

Training

The Commission believes that the appropriate provision of language services is vital to the fulfillment of its mission. Towards that end, the Commission will ensure that its staff is familiar with this Plan.

VI. Evaluation of and Recommendations for the Language Access Plan of the Nevada Gaming Commission

The Commission is committed to monitoring the performance of the above policies, procedures, and resources to ensure that the Plan is responsive to the needs of both the Commission and the individuals regulated by the Commission. The Commission will review, evaluate, and update this Plan biennially.

This review will be conducted by the Board's language access coordinators listed in Section II. A large portion of future updates to this Plan will be conducted in collaboration with the Board's Human Resources Section to ensure that the list of Board staff who can competently read, write, or speak a language other than English is continuously updated. This will ensure that the Board's Employee Registration Unit has the most up-to-date information regarding the language access services the Board and Commission can provide in-house.

At this time, the Commission does not foresee any budget implications regarding this Plan. Additionally, the Commission does not have any proposed statutory amendments to chapter 232 of NRS at this time.