

# *Language Access Plan*

2024



*Division of Welfare and Supportive Services  
Nevada Department of Health and Human Services*

## Welcome

The Nevada Division of Welfare and Supportive Services (DWSS) is honored to be a part of a long tradition of strengthening individuals, families, and communities across Nevada. As we are constantly endeavoring to improve access, barriers to communication are being addressed. This Language Access Plan is a comprehensive account of our ongoing efforts and demonstrates the iterative nature of identifying access needs, planning, and implementing improvements, and assessing efficacy.

Language access is critical to every area of our service delivery. Leaders and policymakers at all levels know the importance of developing strong communities and ensuring that supports for Nevadans are accessible in the language in which they feel most comfortable communicating. We aim to meet those language needs in all modalities of communication including on the phone, in person, on the web, in forms and documents, and holding our partners accountable for the same level of service.

I am proud of the strides we have made in meeting the challenges we face, and we will continue to explore new ways to improve our services and performance. As the intent of the DWSS Language Access Plan is to provide valuable information to enable people to assess our progress and what remains to be accomplished in providing the best possible access to public assistance, my staff and I welcome comments and suggestions so future editions may be improved.

Sincerely,

Robert Thompson, Administrator DWSS

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## Purpose and Authority

Nevada's Senate Bill 318 (SB318) of 2021 Legislative session establishing NRS 232.0081, and the federal guidance on Title VI both agree that language should not be a barrier to accessing governmental programs and services. As SB318 states, "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.

Nevada Division of Welfare and Supportive Services (DWSS) is committed to compliance with NRS 232.0081 as applicable 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.

The purpose of this document is to review existing capabilities, identify gaps and establish an effective plan for future services to individuals who have limited English proficiency. Following this plan and protocol is essential to the success of the DWSS mission.

This Language Access Plan was developed with the assistance of the Governor's Office of New Americans, Aging and Disability Services Division, Division of Public and Behavioral Health and Division of Health Care Financing and Policy.

## Mission

The mission of the Division of Welfare and Supportive Services is to engage customers, staff, and the community to provide public assistance benefits to all who qualify and reasonable support for children with absentee parents to help Nevadans achieve safe, stable, and healthy lives.

## Programs and General Policy

### Programs

DWSS administers many of the state's safety net programs: Temporary Assistance for Needy Families (TANF), Supplemental Nutrition Assistance Program (SNAP), Child Care Development Program, Child Care Licensing, Child Support Enforcement Program and Energy Assistance Program.

DWSS also determines eligibility for Nevada Medicaid, enrolling all income eligible Nevadans to be Medicaid members. The Nevada Division of Health Care Financing and Policy administers the rest of the Nevada Medicaid program.

This plan applies to all Nevada Division of Welfare and Supportive Services' programs and services.

### Temporary Assistance for Needy Families

The purpose of the TANF program is to provide temporary assistance for the care of dependent children in their homes, or in the homes of relatives, by furnishing financial and self-sufficiency services.

"Assistance" is defined as cash payments, vouchers, and other forms of benefits provided to cover a family's ongoing basic needs, such as food, shelter, clothing, etc. It includes childcare, transportation, and other supports for families that are not employed.

### TANF- NEON

The purpose of the NEON Program is to provide recipients of cash assistance with employment assistance, education development, vocational training, and support services by promoting education, job preparation, and work. These services assist customers to become self-sufficient, thereby reducing dependency on cash assistance.

### Social Services

DWSS social workers assist families that experience a multitude of barriers, which prevent them from being both emotionally and economically self-sufficient. These participants are considered "hardest to employ" (HtE) but are still subject to the 60-month cash assistance time limits. Some barriers addressed by social workers are domestic violence, substance abuse, mental health,, and/or caring for children with severe medical or emotional needs.

### Workforce Development

DWSS works with employers both directly and collaboratively by participating in planning, meetings, and initiatives, with networks and agencies like the Governor's Office of Economic Development (GOED), Governor's Office of Workforce of Innovation (GOWINN), Northern Nevada Literacy Council (NNLC), Job Opportunities in Nevada (JOIN), Truckee Meadows Community College (TMCC), Western Nevada College (WNC), Economic Development Authority of Western Nevada (EDAWN), Nevada System of Higher Education (NSHE), and the Department

of Employment Training and Rehabilitation (DETR). DWSS leverages those employer relationships to build momentum to manage expectations of both employees moving from welfare to work, and their future employers; additionally, DWSS Workforce Development further develops initiatives that support workers such as the Recovery Friendly Workplace initiative, which aims to encourage employers to hire people who have barriers related to substance use disorders (SUD) and mental health which can be automatic disqualifiers for employment. DWSS provides education to the employers to break the stigma and encourage flexibility in hiring practices.

#### Supplemental Nutrition Assistance Program

Formerly known as the Food Stamp Program, the Supplemental Nutrition Assistance Program (SNAP), was renamed effective October 1, 2008, by federal mandate in order to engender a more positive identity and to provide broader nutritional support for low-income families. The purpose of SNAP is to raise the nutritional level among low-income households whose limited food purchasing power contributes to hunger and malnutrition.

#### SNAP –Employment and Training

Nevada operates a voluntary SNAP Employment & Training (SNAP E&T) program statewide to provide employment, education, training, and support services to SNAP recipients. Support services, such as transportation and money for work-related costs, are available to participants.

#### Child Care

The Child Care Development Program (CCDP) provides childcare subsidies to income eligible families who are working, searching for work, or participating in the Temporary Assistance for Needy Families (TANF), New Employees of Nevada (NEON) program through the Division of Welfare and Supportive Services. The purpose of CCDP is to provide necessary supports to assist families in moving from welfare to work. In addition to subsidizing childcare, a percentage of program funds are used for quality improvement activities, which include increasing parental access and choice for child care services, improving the delivery of child care services, and providing ongoing education and training to the childcare workforce.

#### Child Care Licensing

Child Care Licensing (CCL) serves Nevada's communities by ensuring the health, safety, and well-being of children in licensed child care facilities. Child Care Licensing staff monitor facility compliance with state laws and regulations, offers technical assistance and training to caregivers, and provides consumer education.

## Child Support

The Child Support Enforcement Program (CSEP) is a federal, state, and local intergovernmental collaboration functioning in all 50 states; the District of Columbia; and the Commonwealths of Puerto Rico, Guam, and the Virgin Islands.

The Nevada CSEP provides five basic services:

- (1) locating parents who have an obligation to support their children;
- (2) establishing paternity for children born outside of marriage;
- (3) establishing financial and medical support orders;
- (4) enforcing support orders;
- (5) collecting and distributing support payments.

The program works closely with family court officials and uses quasi-judicial processes to establish paternity, establish support orders, and enforce support orders.

A variety of families are directly served by the CSEP, including those receiving TANF or public assistance, children receiving assistance under the foster care program, families receiving assistance under the Medicaid program, and all other families who apply for services.

## Energy Assistance

The Energy Assistance Program (EAP) assists low-income Nevadans with the cost of home energy. Funding is provided from the Low-Income Home Energy Assistance Program (LIHEAP) block grant through the US Department of Health and Human Services, and from Universal Energy Charge (UEC) monies distributed through the Nevada Fund for Energy Assistance and Conservation.

## Medicaid Eligibility to include:

**Family Medical Groups** covers individuals, families, and children in Medicaid and Nevada Check-Up. Eligibility is determined using the modified adjusted gross income (MAGI) budgeting methodologies. These groups have no resource test. Medicaid under these groups provide free healthcare coverage for low-income people.

**Specialized Medical Groups** covers individuals in specialized groups, such as Aged out of Foster Care, Rite of Passage, and Breast and Cervical. These groups allow for exemptions from income and resource determinations.

## *Medical Assistance for the Aged, Blind and Disabled (MAABD)*

Medical Assistance for the Aged, Blind, and Disabled (MAABD) is a medical service only program. Frequently, many applicants are already on Medicare; thus, Medicaid supplements their Medicare coverage. Additionally, others are eligible for Medicaid coverage as a result of being eligible for a means-tested public assistance program (i.e., Supplemental Security Income [SSI]).

## Medicare Savings Program

Medicare Savings Programs are different from other coverage groups in that they do not receive the full scope of Medicaid benefits. The five groups described below comprise the Medicare Savings Program population. Application for benefits must be made, with a decision rendered within forty-five (45) days. Success in the Medicare Savings Program is assessed by the fact that program expenditures by the state are lowered if the state can pay for a low-income individual's Medicare premium. For example, a medical service costing \$100 is incurred by a client with dual coverage, with approximately 80% of the charge (\$80) paid by Medicare, with the remaining \$20 paid on a 50/50 basis by the state and federal government.

Eligible groups include:

- 1. Qualified Medicare Beneficiaries (QMBs)** are Medicare recipients who have income at or below 100% of the federal poverty level. Medicaid pays the Medicare premiums, co-insurance, and deductibles for these individuals. Eligibility begins the month following the month the eligibility decision is made.
- 2. Special Low Income Medicare Beneficiaries (SLMBs)** are Medicare recipients with incomes between 100% - 120% of the federal poverty level. Medicaid pays their Medicare Part B medical insurance premiums. Eligibility begins with the application month with three months of prior medical coverage available.
- 3. Qualifying Individuals 1 (QIs-1)** are Medicare recipients with income of at least 120%, but less than 135% of the federal poverty level. Medicaid pays their Medicare Part B medical insurance premiums. Funding is 100% federal up to the state allocation. Eligibility begins in the application month; applicants can request eligibility to be determined for the three months prior to the application month.
- 4. Qualified Disabled Working Individuals (QDWIs)** have their Medicare Part A hospital insurance premiums paid by Medicaid. Eligibility begins in the application month; applicants can request eligibility to be determined for the three months prior to the application month.

## Plan Oversight

The DWSS Language Access Coordinator is responsible for the development and maintenance of the Language Access Plan (LAP) to include:

Facilitation of Division workgroups (consisting of DWSS program leadership) to obtain necessary data and information to comply with NRS 232.0081 and all elements required in the LAP:

- Act as the Liaison and be responsible for coordination with other agencies regarding the LAP;
- Drafting the LAP incorporating feedback from Division workgroups;



- Solicit public feedback
- Finalize the plan to include fiscal impacts, receive Administrator approval, and submit with the agency recommended biennial budget; and
- Maintain ongoing plan monitoring and revisions to the plan.

The DWSS Managers/Chiefs of all program areas are responsible for implementation of the LAP to include:

- Active participation in the LAP workgroups and LAP decision making; to include forward facing staff who work directly with the public.
- Implementation and oversight of the LAP for their respective programs and staff/contractors; and
- Communication and Training on the LAP at initial roll out, training for all new staff/contractors as part of onboarding, and annual training for all staff/contractors.

**Nevada Division of Welfare and Supportive Services Language Access Coordinator:**

Kristle Muessle, Public Information Officer – [kmuessle@dwss.nv.gov](mailto:kmuessle@dwss.nv.gov)

Backup: Bertha Bobadilla, Diversity, Equity and Inclusion Liaison

**Nevada Division of Welfare and Supportive Services LEP Customers**

The demographic data about customers that is collected by DWSS depends on the program and services the client is eligible and enrolled to use. Some of the data is collected and retained in a way that can be queried, and some is gathered in a way that is meant for the use of caseworkers, not for reporting purposes. Many demographic data points are not required to be shared by customers as a factor of determining eligibility. While DWSS conscientiously make every effort to validate the data, DWSS relies heavily on client attestation for personal demographic details and respects the customers' right not to answer. Any and all data that is gathered or shared for purposes other than what it was intended should be scrutinized with skepticism.

The common denominator of customers served directly by DWSS is that they meet some definition of low-income or are owed or paying court-ordered child support, or both.

People who are indirectly served by DWSS are typically looking for or sharing information about DWSS programs.

Many client transactions with DWSS are within the customer service realm. The majority of DWSS client engagement is to process applications, answer questions, or refer to additional resources. For example, DWSS may approve a client for SNAP benefits, but DWSS does not itself, sell food or feed people directly. Instead, DWSS issues an Electronic Benefit Transfer (EBT) card to the client, who then can use the card to purchase food elsewhere.

There is a small subset of client transactions with more involved engagement, usually around social worker interventions, or job training. These transactions are by nature case-by-case and usually somewhat customized to the circumstance.

While SB318 specifically requires agencies to report the following information, much of the data is not kept in a way that can be queried readily and some is not currently gathered by DWSS:

1. Type of services received by the relevant groups.
2. Preferred languages of LEP customers.
3. Literacy levels of LEP customers in their preferred language and in English.
4. Ability of the relevant groups to access agency services electronically.
5. Number and percentage of customers who are indigenous.
6. Number and percentage of customers who are refugees.

DWSS has made efforts to modify computer systems as applicable to help collect the required information. This may include engaging with the Health and Human Service Office of Data Analytics and Governor's Office of New Americans. The LAP coordinator and back-up will work together to establish regular meetings and work groups as necessary to enhance future iterations of the LAP. There are several ways to gather data.

DWSS is committed to provide meaningful, timely access to our services and programs without regard to any language impediments by tracking the languages preferred for communication among our I LEP customers.

The chart below shows the top 10 languages that utilized telephonic interpretive language services a full year (April 2023 to May 2024).

Language	Minutes	Calls	Ave. Call Length (Mins.)	Ave, Connect (Seconds)	Percent of Total Calls
<b>Spanish</b>	831,006.70	31,176	26.66	11	86.06%
<b>Haitian Creole</b>	45,5500.00	1,540	29.58	21	4.25%
<b>Arabic</b>	14,950.40	434	34.45	12	1.20%
<b>Mandarin</b>	11,717.00	429	27.31	29	1.18%
<b>Russian</b>	10,089.50	355	28.42	19	0.98%
<b>Farsi (Persian)</b>	9,997.40	324	30.86	27	0.89%
<b>Vietnamese</b>	4,525.10	179	25.28	14	0.49%
<b>Swahili</b>	5,819.10	171	34.03	13	0.47%
<b>Dari</b>	5,260.50	167	31.50	20	0.46%
<b>French</b>	4,155.90	153	27.16	15	0.42%

**Population of Refugees and Native American Recipients**

<b>Refugee population receiving assistance</b>	<b>3,171</b>
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Native American Enrollees	Counts
American Indians/Alaska Native (Hispanic)	6,453
American Indians/Alaska Native (Non-Hispanic)	9,172

This chart shows the preferred languages for Nevada SNAP/TANF/Medicaid recipients.

Primary Language	Preferred	% of Total
ENGLISH	886,571	86.654%
SPANISH	127,106	12.423%
OTHER	5,565	0.544%
CHINESE	1,503	0.147%
VIETNAMESE	764	0.075%
TAGALOG	618	0.060%
RUSSIAN	428	0.042%
FRENCH	261	0.026%
PORTUGUESE	104	0.010%
LAOTIAN	91	0.009%
CAMBODIAN	50	0.005%
JAPANESE	37	0.004%
POLISH	10	0.001%
ITALIAN	9	0.001%
Grand Total	1,023,117	100.000%

Of those, the number of households that require Interpreter services

Primary Language	Interpreter Yes
SPANISH	79,267
ENGLISH	7,370
OTHER	2,845
CHINESE	787
VIETNAMESE	435
TAGALOG	262
RUSSIAN	234
FRENCH	168
PORTUGUESE	61
LAOTIAN	29
CAMBODIAN	28
JAPANESE	16
POLISH	7
ITALIAN	3
Grand Total	91,512

There are approximately 2,100 employees in DWSS. The data below shows the number of employees that speak 2 or more languages.

Language Spoken	Number of Employees
Amharic	2
Arabic	1
Armenian	2
ASL	1
Bosnian	1
Cantonese	1
Czech	1
Farsi	1
French	1
Gujarati	2
Hindi	2
Hungarian	1
Ilocano	1
Japanese	1
Korean	1
Mandarin	3
Portuguese	5
Romanian	1
Russian	1
Samoan	2
Sinhala	4
Sinhalese	1
Spanish	370
Swahili	1
Tagalog	25
Tongan	1
Turkish	1
Vietnamese	1

**Nevada Division of Welfare and Supportive Services Language Access Services and Procedures and Implementation –**

Identify Customer’s Language Needs and Preferred Language:

- Greet all customers appropriately and immediately ask customers preferred language.
- Inform customers the availability of language services at first contact.

- Record and track LEP customers' language preferences in applicable computer system if available.

For direct services where staff are working with LEP customers visiting DWSS offices in person for SNAP/TANF/ Medicaid eligibility related business, staff use the "I Speak Card" to identify which language the customer is most comfortable using. The process for using DWSS in-house Spanish interpretation as well as using third-party telephonic translation services are outlined below.

### **DWSS Spanish In-house Interpreter Service Procedures**

**The following information will be used by staff and interpreter agents to make conference calls with Spanish speaking DWSS clients using the Nellis Language Line.**

Please Note: For customers speaking any language other than Spanish the Language Link will need to be contacted via 1-877-650-8021.

#### **Procedures:**

- 1. Customer call comes into CCT, DO Flex Line or the client is physically in the DO.**
- 2. Customer speaks Spanish and the staff does not.**
  - **If the customer is on the phone staff will press the telephone conference button. The staff will dial code \*103 15 to call the Nellis Language Line. The staff will then press the telephone conference button Again to complete conference connection.**
  - **If the client is physically in the office, the staff will dial code \*103 15 with the phone on speaker so the client and the staff can hear the translator.**
- 3. After translation services are completed, all parties may hang up.**

NOTE: If no agents are logged into the system, the calling party will get a "Please Wait Message" then will be placed on a music hold. If all interpreters are on another call the staff will hear a message advising them that all agents are busy and to please hold. They will then be placed on a music hold until there is an available interpreter to take the call.

**If the staff is on hold for more than 3 minutes, they should then drop the Nellis Language Line call and contact the Language Link. (1-877-650-8021).**

## Procedures for Accessing external CTS Language Line

The Nevada State Purchasing Division recently awarded a contract for interpretive services, conducted entirely over the telephone, to CTS Language Link. This company provides immediate interpretive services in most languages. These services are accessed through an 800 number and prior scheduling is not required.

To access these services the following steps must be taken:

- Step 1: Call 1-877-650-8021
- Step 2: Enter Account Number, followed by the # sign.
- Step 3: Select 1 to be connected directly to a Spanish interpreter, or  
  
Select 9 for all other languages. This will connect the caller to a Customer Service Representative who will then connect the caller to the requested interpreter.
- Step 4: Enter the Access Code assigned to the appropriate district office followed by the # sign.
- Step 5: When the call is completed, the caller must complete all areas of Section I of Form **2034-WG, Confirmation of Interpretive Services Provided**. Section II and page 2 do not need to be completed when CTS Language Link is used. Once this form is completed, it must be forwarded to the District Office designee the same business day the service is used.

## Sign Language Interpreting

DWSS engages staff employed as ASL interpreters by the Nevada Aging and Disability Services Division. When those interpreters are unavailable, contractors are hired by DWSS. Finding and scheduling this type of interpreter can be difficult. However, DWSS launched a pilot program in May 2024 for video remote interpreting services as well as potential dual-role staff who can interpret in compliance with NRS 656A.

## Written Language Services

DWSS will send client written information about their SNAP, TANF or Medicaid case in either English or Spanish based on client preference.

For Spanish translation of written forms, flyers, and other items, DWSS has a full-time staff translator.

## Community Outreach and Engagement

Nevada Division of Welfare and Supportive Services is committed to ensuring that the larger LEP community is aware of and able to access all available language services. In doing so, DWSS has taken steps to publicize the availability of its language services in the community. All DWSS information boards are available in English and Spanish. Additionally, DWSS continues to provide notification of its services at all relevant points of contact through various forms of outreach, out stationed staff, and special events.

## Evaluation of and Recommendations for Nevada Division of Welfare and Supportive Services' Language Access Plan

### Processes for Monitoring and Evaluation

### Key Recommendations

DWSS senior leadership has assigned staff to take the following actions over the next two years to comply with NRS 232.0081 and report the results to the Language Access Coordinator by August 1, 2024, to be included in the 2026 Language Access Plan update.

1. Identify staff responsible for monitoring compliance related to WAM 500.
2. Post a list of language access services in a manner that is visible to serve persons who speak all frequently used languages during office closures, including emergency closures-
3. Develop procedures for designating certain information as vital for LEP accessibility.
4. Each program will participate in regular meetings to implement and improve language access in their respective program area.
5. Request that the Deputy Attorney General determine the threshold for language translation to comply with Safe Harbor.
6. Each program will ensure vital documents identified are translated into the appropriate languages to comply with Safe Harbor.
7. Develop and include accommodation language at the top of meeting notices for LEP individuals.



8. Identify staff to review and report partner and vendor language services offered including the display of “Attention” cards or similar, develop recommendations and/or corrective actions regarding those services
9. Develop procedures for customers to request written translation.
10. Survey all DWSS employees for fluency in more than one language and develop a comparison with the number of employees who regularly have contact with the public in aggregate and disaggregated by language.
11. Review the literacy level of the “Attention” translation card and ensure it is 6<sup>th</sup> grade or lower in all languages.
12. Monitor Division of Human Resource Management (DHRM) progress toward offering necessary credentials for staff currently identified as bilingual to act as staff translators.
13. Identify and implement ongoing training schedule that is online for language and cultural competency similar to training offered by Information Technology for information security purposes.
14. Request the Office of Analytics to develop an analysis of Nevada populations, who may qualify for DWSS services including their ethnicity and preferred languages for the next Language Access Plan update.
15. Engage Nevada Governor’s Office of New Americans to advise and collaborate on all initiative of language access for DWSS.

Nevada DWSS is working on computer system maintenance, updates and modernization, which will assist in gathering necessary data to inform Language Access at DWSS. Additionally, a portion of DWSS training budget should be considered in order to implement ongoing cultural competence training.