

# NEVADA COMMISSION FOR PERSONS WHO ARE DEAF AND HARD OF HEARING

## (DRAFT) Position on Government and State Agencies who Provide Services to People who are Deaf and Hard of Hearing (D/HH)

**Scope:** The **Nevada Commission for Persons who are Deaf and Hard of Hearing (NVCDHH)** is established to provide advocacy on behalf of individuals who are Deaf and Hard of Hearing (D/HH), including the development of the Nevada State Plan for the Deaf (D), Hard of Hearing (HH), Speech-Impaired (SI), DeafBlind (DB), and Deaf Plus (D+). The Commission, established in 2017, works to promote full inclusion, equal access, and self-sufficiency of D/HH/SI/DB/D+ in the State of Nevada. As an advisory and advocacy body to the state, local government, policymakers, and stakeholders, the NVCDHH makes recommendations to address systemic barriers and to advocate for policies that enhance communication access, education, healthcare, employment, and community engagement. Statutory Authority: [NRS 427A.70](#).

For the purposes of this position statement the term “Deaf and Hard of Hearing (D/HH)” will be used throughout this document to include persons who are Deaf (D), DeafBlind (DB), Hard of Hearing (HH), Speech Impaired (SI), and Deaf or Hard of Hearing Plus (D/HH+).

### **Government and State Agencies who Provide Services to People who are Deaf and Hard of Hearing (D/HH)**

Ensuring accessibility is essential for promoting independence, participation, and inclusion within all aspects of society. Several laws, including the Americans with Disabilities Act (ADA), Section 504 of the Rehabilitation Act, and the Communications and Video Accessibility Act (CVAA), mandate that government and state agencies provide accessible and accommodating services to individuals with disabilities. Additionally, under Nevada Revised Statutes (NRS) 232.010, state agencies are required to provide meaningful language access to individuals with Limited English Proficiency (LEP), ensuring that communication needs are met. For these efforts to be effective, agencies must address the unique communication needs of D/HH individuals through appropriate accommodations, technology, and linguistic access.

**The Nevada Commission for Persons who are Deaf, Hard of Hearing, or Speech Impaired advocates for equitable access to services provided by government and state agencies for individuals who are Deaf and Hard of Hearing (D/HH).**

Government and state agencies must prioritize the accommodation needs of all individuals who are D/HH. They can do so by:

- 1. Enhancing Accessibility Through Technology:** Government and state agencies must prioritize the installation and maintenance of assistive technologies to support D/HH individuals in accessing services. This includes:
  - T-Coils and Bluetooth Systems:** Equipping government buildings and public spaces with hearing loops, T-coils, and Bluetooth-compatible systems ensures individuals with hearing aids or cochlear implants can fully access auditory information. These systems provide clear

sound quality, reducing background noise and enhancing understanding in public settings such as meeting rooms, courtrooms, and service counters.

- **Modernized Communication Tools:** Agencies should incorporate emerging technologies to support **D/HH** individuals, including video relay services (VRS) and **RealTime Text** (RTT), to accommodate diverse communication needs.
2. **Ensuring Language Access:** Language access must go beyond written communication to include American Sign Language (ASL) interpretation and visual resources. ASL is a distinct language with its own grammar, syntax, and structure, separate from English. Relying solely on written English fails to address the linguistic needs of ASL users. To ensure comprehensive language access:
    - **ASL Interpretation:** Agencies must provide ASL Interpreters for all public-facing services, meetings, and events to ensure equal access to critical information and resources.
    - **Visual Communication:** In addition to written English materials, agencies should develop visual resources, such as ASL videos and pictorial guides, to accommodate individuals whose primary language is ASL.
  3. **Improving Accessibility in Government Buildings and Public Spaces** Creating accessible physical environments is a vital component of inclusive government services. This includes:
    - Installing hearing loop systems and other assistive technologies in public service counters, conference rooms, and auditoriums.
    - Ensuring visual announcements, such as digital displays and captioning, are available in government facilities to provide equal access to information shared audibly.
    - Conducting regular accessibility audits to identify and address gaps in communication and physical access for **D/HH** individuals.

**Policy Recommendations:** To ensure equitable access to services for **D/HH** individuals, the Nevada Commission for Persons who are Deaf, Hard of Hearing (**NVCDHH**) recommends the following:

1. **Adopt Universal Assistive Technology Standards:**
  - Support the implementation of T-coils, hearing loops, and Bluetooth systems in all government buildings and public spaces.
  - Provide funding and technical support to retrofit existing facilities with these technologies.
2. **Expand Language Access Services:**
  - Require ASL interpretation for all public services and events.
  - Develop visual communication materials in ASL to complement written resources.
3. **Enhance Accessibility in Public Spaces:**
  - Ensure all government facilities are equipped with visual announcement systems and captioning technologies.

- Regularly audit and address accessibility needs in collaboration with the D/HH community.

#### 4. Educate Public Servants and Policymakers:

- Conduct mandatory training on the linguistic and cultural needs of D/HH individuals, emphasizing the distinction between ASL and English.
- Provide resources and best practices for ensuring accessibility in service delivery.

**Proposed Next Steps (Call to Action):** Government and state agencies must lead the way in creating inclusive environments that address the unique needs of individuals who are D/HH. By integrating assistive technologies, expanding language access, and enhancing accessibility in public spaces, Nevada can ensure all individuals have equitable opportunities to engage with and benefit from public services.

**Conclusion:** Accessible government services are a cornerstone of an inclusive society. By addressing the linguistic and technological needs of the D/HH community, Nevada can set a standard for equitable and effective service delivery. The Nevada Commission for Persons who are Deaf, Hard of Hearing (NVCDHH) on state and local agencies to adopt these recommendations and foster a more inclusive future for all Nevadans.