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## DEPARTMENT OF HEALTH AND HUMAN SERVICES

AGING AND DISABILITY SERVICES DIVISION  
*Helping people. It's who we are and what we do.*



Dena Schmidt  
Administrator

February 20, 2025

### **RE: Addressing the Implications of SB78 and Proposing Alternatives**

Dear Members of the Nevada Legislature:

Senate bill 78 (SB78) recently introduced in the 83rd session of the Nevada Legislature proposes eliminating the Nevada Commission for Persons Who Are Deaf and Hard of Hearing (Deaf Commission) and transferring its responsibilities to the Nevada Equal Rights Commission (NERC). While this move aims to streamline government functions, it risks weakening essential advocacy, outreach, and community engagement efforts for the Deaf and hard of hearing (D/HH) population.

The Deaf Commission plays a **unique and irreplaceable role** in:

- **Advocating for policy reforms** affecting D/HH individuals.
- **Bringing together diverse stakeholders** (advocates, educators, interpreters, parents, service providers).
- **Organizing community engagement efforts** through town halls, conferences, and public meetings.

We urge legislators to consider alternatives that preserve the **impact and inclusivity** of the Deaf Commission while enhancing coordination with NERC.

### **The Deaf Commission: A Proven Model of Success**

Established in 2017, the Deaf Commission replaced a subcommittee that had limited authority and reach. Since then, it has:

- **Built a collaborative network** among nonprofits, service providers, and policymakers.
- **Held quarterly commission and subcommittee meetings** to address pressing issues.
- **Conducted statewide town halls** in urban and rural communities.
- **Organized annual conferences** to align strategies and advocacy efforts.
- **Monitored systemic issues**, including violations of the Americans with Disabilities Act (ADA).

No other entity in Nevada **performs this level of community organizing and advocacy** for D/HH individuals. Eliminating the Deaf Commission would unravel years of progress and **diminish the voices of a historically marginalized community**.

## Concerns with SB78 and Its Implications

### 1. Dilution of Representation

- SB78 proposes adding only **two Deaf representatives** to NERC, compared to the **12-member Deaf Commission** that includes a diverse range of stakeholders.
- Without this broad representation, **critical voices—such as parents, educators, and interpreters—would be lost** in decision-making.

### 2. Loss of a Dedicated Executive Director

- While Deaf Commission members serve voluntarily, its **Executive Director is a full-time position essential for community engagement and advocacy**.
- Eliminating the Commission **removes this role**, significantly reducing the state’s ability to respond to issues affecting D/HH individuals.

### 3. Potential Conflict of Interest in Oversight

- The Deaf Commission currently operates under **Aging and Disability Services Division (ADSD)**, which also provides services to the community.
- This structure can create **challenges in holding ADSD accountable** for service gaps.
- A **better solution** would be to move the Deaf Commission to a more neutral department **rather than eliminate it entirely**.

### 4. Overlooking an Inactive Advisory Committee Instead

- SB78 **preserves** the Advisory Committee on Language Development under the Department of Education, despite its inactivity.
- A **better efficiency measure** would be eliminating this inactive committee instead of disbanding a fully functioning Deaf Commission.

## Recommended Alternative Solutions

To align with the intent of SB78 while **preserving effective advocacy**, we propose the following:

1. **Maintain the Deaf Commission as a separate advisory body** under a neutral agency outside of ADSD.
2. **Enhance coordination between the Deaf Commission and NERC** to leverage NERC’s enforcement authority while keeping community-driven advocacy intact.
3. **Expand NERC’s representation for D/HH individuals** beyond two seats, ensuring equitable participation.

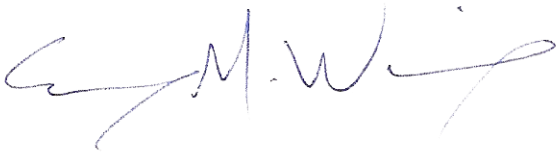
4. **Eliminate inactive committees** rather than disbanding an active and impactful Commission.

### **Conclusion: A Path Forward**

While we recognize the goal of improving government efficiency, SB78, as written, would **dismantle critical advocacy infrastructure** for Nevada's Deaf and hard of hearing community. We are committed to working with the Legislature to find a **solution that upholds the intent of SB78 without sacrificing the vital role of the Deaf Commission**.

We welcome the opportunity to discuss **practical alternatives** that preserve representation, sustain community engagement, and enhance coordination with NERC.

**Thank you for your consideration.**

A handwritten signature in blue ink, appearing to read "Eric M. Wilcox". The signature is fluid and cursive, with the first name "Eric" and last name "Wilcox" being the most legible parts.

Eric M. Wilcox

Chairperson of the Nevada Commission for Persons who are Deaf and Hard of Hearing