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Governor

NEVADA HEALTH AUTHORITY PUBLIC EMPLOYEES' BENEFITS PROGRAM

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Language Access Plan

Section 1: Purpose and Authority

Nevada Revised Statutes (NRS) 232.0081 requires the Nevada Public Employees' Benefits Program (PEBP) have a Language Access Plan (LAP) to ensure that members with Limited English Proficiency (LEP) have access to oral and written communication in their preferred language at a literacy level and format they can understand, and the degree to which PEBP meets those needs.

Section 2: Definitions

- A. **Language Access Coordinator:** PEBP staff that have been delegated the responsibility of developing, implementing, and carrying out the requirements of the LAP.
- B. **Language Access Plan (LAP):** The document that outlines how PEBP shall provide services to LEP.
- C. **Language Services:** Oral language services and translation services.
- D. **Oral Language Services:** Services to convey verbal information to persons with limited English proficiency. The term:
 - a. Includes, without limitation, staff interpreters, dual-role interpreters, other multilingual employees, telephone interpreter programs, audiovisual interpretation services and non-governmental interpreters.
 - b. Does not include family members, friends and other acquaintances of persons with limited English proficiency who have no formal training in interpreting.
- E. **Person with Limited English Proficiency (LEP):** A person who reads, writes or speaks a language other than English and who cannot readily understand or communicate in the English language in written or spoken form, as applicable, based on the manner in which information is being communicated.
- F. **Translation Services:** Services used to provide written information to persons with limited English proficiency. The term does not include translation tools that are accessed using the Internet.

Section 3: General Policy

PEBP recognizes its obligation to provide to members with LEP meaningful and timely access to its services, including its online member portal, communication with PEBP staff and member-facing vendors, new hire education, plan documents, and notices.

PEBP currently provides a notice of non-discrimination that includes information about how to access PEBP's services in numerous languages, including Spanish, Tagalog, Chinese, Korean, Vietnamese, Amharic, Thai, Japanese, Arabic, Russian, French, Persian, Samoan, and German: <https://pebp.nv.gov/Plans/mandatory-notices/>. Upon request for translation, including for captions or sign language, PEBP contacts a contracted vendor identified on the Department of Administration's Purchasing Division Statewide Contracts for Translation and Interpretation services to fulfill such requests. There have been no such requests in the last ten years.

Language Access Coordination

Quality Control Unit
3427 Goni Road, Suite 109
Carson City, NV 89706
775-684-7000

Language Access Coordinator

Quality Control Officer
3427 Goni Road, Suite 109
Carson City, NV 89706
775-684-7000

Procedures

The Member Services Unit (MSU) shall accept requests for language services in the following manner.

1. Provide the member the Non-Discrimination Notice containing information in numerous languages besides English and determine the members' preferred language.
2. Note the member's preferred language in the member's account.
3. Notify the Quality Control (QC) Unit so that appropriate interpretation and/or translation services may be arranged.
4. All requests shall be logged as a quality control case.
5. The size of the document shall dictate the course of action. Small documents (5 pages or less) shall be translated in-house through current staff resources or Microsoft Translator. Staff shall obtain the services of a State Purchasing vendor for documents 6 pages or more through the current purchase order processes.
6. QC shall inform the member that the request has been received and provide an estimate time for completion.
7. QC shall notify the Office of New Americans (ONA) of all requests for language access services and provide any requested information.

Complaint Process

PEBP allows members to submit several types of requests online that are routed directly to QC such as member services issues, complaints, and appeals. A reason code has been added to all request types: “Language Translation Request”. QC shall follow the same procedures as outlined on page 2.

Section 4: Profile of PEBPs Members & Others

PEBP is a Nevada state entity established pursuant to NRS 287 that administers a health insurance program offering medical, prescription drug, dental, and basic life insurance benefits to eligible members. Eligible members primarily include officers, employees, and retirees of the State of Nevada and other certain non-state local governmental agencies and the dependents of such individuals. Because PEBP members are generally state and local government employees, members are typically English proficient.

In addition to PEBP members, there are “others” that PEBP directly works with. PEBP contracts with vendors, oversees a Board, works with advocates, and interacts with participating public agency staff. As with members, these “others” are typically English proficient.

Collection of Member Demographic Information

PEBP does not collect information related to the race/ethnicity, preferred or primary language, language proficiency, literacy, or refugee status of its members. If PEBP were to seek such information about its members, it would request pertinent and available demographic information from the Division of Human Resources Management and other agency partners, such as the Nevada System of Higher Education. If PEBP were to begin collecting such information directly from its members, it would require revision of numerous forms and system enhancements through the appropriate vendor to populate, store, and report such data.

Section 5: Language Access Services

Vital Documents

PEBP has identified vital documents required for members to use its services and those required by state and federal law. Those documents are:

1. Enrollment and Eligibility Master Plan Document
2. Consumer Driven Health Plan Master Plan Document
3. Low-Deductible Plan Master Plan Document
4. Exclusive Provider Organization Plan Master Plan Document
5. Dental and Basic Life Insurance Master Plan Document
6. Health Reimbursement Arrangement Summary Plan Description
7. Flexible Spending Accounts Master Plan Document
8. Carrum Health: Centers of Excellence Wrap Plan Document

9. Health and Welfare Wrap Plan Document
10. Section 125: Health and Welfare Benefits Plan Document
11. Notices to members
12. Forms for members to participate in PEBP

These vital documents are revised annually.

Bilingual Staff

While PEBP does have some bilingual staff, none qualify as certified translators.

Staff Training Policies and Procedures

PEBP ensures that its staff are familiar with its language access plan. Internally, the LAP is located with all PEBP policies which must be reviewed upon hire or revision.

Community Outreach and Engagement

In addition to the language access resources set forth in its non-discrimination notice, as described above, PEBP has notified agency representatives, who deal directly with PEBP members, of its language access services. The following are ongoing:

1. The PEBP Board meets every other month.
2. PEBP staff sends quarterly newsletters to members.
3. PEBP staff education resources for agency representatives.

Oral Language Services

The preferred method to serve LEP members is by having multilingual staff who can communicate with members orally. In the absence of these staff resources, staff are authorized to:

1. Utilize translation applications, such as Microsoft Translator, to triage the initial interaction and proceed to the next step.
2. Seek professional interpretation and translation services from an appropriate vendor, with the assistance of the Quality Control Unit.

Written Language Services

According to PEBP's stated policy on the determination of "vital" documents, the following procedures shall be followed to access qualified written language services. This applies both to written information intended for broad distribution as well as written communication between PEBP and members.

1. Identify the LEP members preferred language by utilizing the non-discrimination notice as a template for assistance.

2. Inform the members that the documents shall be provided in their preferred written language.
3. Utilize online translation applications, such as Microsoft Translator, to triage the initial interaction and proceed to the next step.
4. QC will seek appropriate professional interpretation and translation services from an appropriate vendor, on an expedited basis, if necessary.
5. Once any translation is completed, PEBP staff will call the PEBP member and arrange delivery of the document by mail or email.

Section 6: Evaluation and Quality Assurance

The responsibility for monitoring and evaluating the language access plan lies with the Quality Control Unit and is subject to approval by the PEBP Board.

PEBP's Quality Control Unit shall track all access requests from members and vendors. In the past ten years, there have been no requests for translation services; therefore, PEBP does not currently analyze performance measures based on translation services.

The qualifications of those providing oral language or written translation services are documented in the Department of Administration's Purchasing Division Statewide Contracts for Translation and Interpretation. Any dissatisfaction with such services shall be relayed to the Purchasing Division.

This language access plan shall be reviewed every two years or sooner when deemed necessary.

Section 7: Budgetary Implications

Combined, these documents contain more than 335,000 words (refer to Vital Documents on pages 3-4). The estimated costs to translate these documents, by language, utilizing the State's contracted translations vendors is noted below. Two contracts were used for this Plan.

Vendor Number	Spanish	Chinese (Mandarin & Cantonese), Arabic, Russian, Farsi, Vietnamese, Swahili, Somali, Korean, French, Portuguese, German, Italian	Bosnian-Serbo Croatian, Bulgarian, Czech, Danish, Dutch, Finnish, Flemish, Greek, Hungarian, Norwegian, Polish, Romanian, Slovak, Slovenian, Swedish, Turkish, Ukrainian	All other languages (includes Tagalog)
99SWC- NV22-11680	\$0.15/word	\$0.18/ word	\$0.25 / word	\$0.28 / word

Cost	\$50,250	\$60,300	\$83,750	\$93,800
99SWE- NV22- 11960	\$0.14/word	\$0.17 / word	\$0.18 / word	\$0.19 / word
Cost	\$46,900	\$56,950	\$60,300	\$63,650

The top three languages spoken in Nevada after English are Spanish, Tagalog, and Chinese¹. To translate some or all the vital documents into those languages would cost PEBP up to **\$288,100 per year** (using the highest estimate). Expedited translations are noted to have significantly higher costs per word.

As no members have requested translation of the vital documents in the past ten years, it appears that members with limited English proficiency constitute less than 5% of PEBP's eligible population. Accordingly, these documents have not been preemptively translated. In the event PEBP requires translation of these documents, the cost would be included in PEBPs annual budget.

For PEBP to track members who are indigenous, a refugee, or with LEP, the enrollment and eligibility system will require a system enhancement. According to the vendor, this would cost approximately **\$35,000** (\$15,000 for the identification of LEP and \$20,000 for the identification of indigenous or refugee).

Additionally, PEBP may request an enhancement to the enrollment and eligibility system to display the online member portal in other languages. The vendor indicates that translation to Spanish only will cost approximately **\$300,000**.

Date: July 2025

Next Review: July 2027

¹ <https://www.guinncenter.org/articles/the-2020-census-in-nevada-snapshot-7>