

## NOTICE OF ADOPTION OF REGULATION

The Aging and Disability Services Division adopted regulations assigned LCB File No. R016-22P which pertain to chapter 656A of the Nevada Administrative Code on August 30, 2022. A copy of the regulations as adopted is attached hereto.

### LEGISLATIVE REVIEW OF ADOPTED REGULATIONS INFORMATIONAL STATEMENT AS REQUIRED BY NRS 233B.066

#### LCB FILE R016-22P

The following statement is submitted for adopted amendments to Nevada Administrative Code (NAC) Chapter 656A.

#### **1. A clear and concise explanation of the need for the adopted regulation.**

This regulation is necessary to update the regulations to comply with recent statutory changes.

#### **2. A description of how public comment was solicited, a summary of public response, and an explanation how other interested persons may obtain a copy of the summary.**

Copies of the proposed regulations, notices of workshop and notices of intent to act upon the regulation were sent by email to persons who were known to have an interest in the subject of sign language interpreter qualifications as well as any persons who had specifically requested such notice. These documents were also made available at the website of the Aging and Disability Services Division, [https://adsd.nv.gov/Meetings/Meeting\\_Notices/](https://adsd.nv.gov/Meetings/Meeting_Notices/), and sent to the following Aging and Disability Services Division regional offices for posting:

Carson City  
3208 Goni Road, Building I, Suite 181  
Carson City, NV 89706

Las Vegas  
3320 West Sahara Avenue, Suite 100  
Las Vegas, NV 89102

Elko  
1010 Ruby Vista Drive, Suite 104  
Elko, NV 89801

Reno  
9670 Gateway Drive, Suite 100  
Reno, NV 89521

A workshop was held on July 29, 2021, and the minutes of that meeting, see attachment A, contain a summary of the discussion held regarding the proposed amendments. Thereafter, on or about July 22, 2022, the Administrator of the Aging and Disability Services Division issued a Notice of Intent to Act Upon a Regulation which incorporated in the proposed amendments the suggestions of the parties attending the July 29th workshop. A public hearing was held on August 30, 2022.

A copy of this summary of the public response to the proposed regulation, see attachment B, may be obtained from the Aging and Disability Services Division, 3208 Goni Road, Building I, Suite 181, Carson City, Nevada 89706, 775-687-4210, or email to [InterpreterRegistry@adsd.nv.gov](mailto:InterpreterRegistry@adsd.nv.gov).

**3. The number persons who:**

(a) **Attended each hearing:** July 29, 2021: 12; August 30, 2022: 31

(b) **Testified at each hearing:** July 29, 2021: 5; August 30, 2022: 7

(c) **Submitted to the agency written comments:** July 29, 2021: 2; August 30, 2022: 0

**4. A list of names and contact information, including telephone number, business address, business telephone number, electronic mail address, and name of entity or organization represented, for each person identified above in #3, as provided to the agency.**

Please note, contact information was not collected as meetings were hosted on an online platform. No physical locations were provided.

July 29, 2021 Workshop Attendees:

ADSD Staff:

Jennifer Montoya, Social Service Program Specialist II

Kalen Beck, Sign Language Interpreter/Mentor

Kim Johnson, Sign Language Interpreter/Mentor

Megan Johnson, Sign Language Interpreter/Mentor

Jeff Jaech, Sign Language Interpreter/Mentor

Members of the Public:

Andrea Juillerat-Olvera

Amy Ford

Araceli Pyper

Jamers Speier

Jamie Jaramillo

Laura Fink

Laura (LT) Thompson

Lisa Wolfe

Kim Ryan

Paul Marcere

Tori Jaramillo

Zelma Anderson

August 30, 2022 Hearing Attendees:

ADSD Staff:

Jennifer Montoya, Interim Social Service Program Specialist III

Jeff Jaech, Sign Language Interpreter/Mentor

Sara Nolan, Administrative Assistant

Kim Johnson, Sign Language Interpreter/Mentor

Megan Johnson, Sign Language Interpreter/Mentor

Kalen Beck, Sign Language Interpreter/Mentor  
Adrienne Navarro, Chief I

Members of the Public:

Andrea Juillerat-Olvera  
Betty Hammond  
Dawn Duran  
Dawn Lyons  
Dena Maurer  
Denise Asap sports  
Ehren Dei  
Ellen Thompson  
Gina Gifford  
Goldie Kappes  
Griselda Navarrete  
Hanna Paddack  
Hans C Ferguson  
Helaina  
Joey Hitchcock  
Kayla  
Kim Ryan  
Kitty Edwards  
Laura (LT) Thompson  
Laura Fink  
Lonyae Bigby  
Lora Turner  
Lyssa Goldsworthy  
Marlene Daniel  
Michelle (Albrecht) Cordova  
Tim Smalley - Nevada Association of the Deaf  
Nevada Black Deaf Advocates  
Sandra Jackson  
Sara Brewer  
Shannon Council  
Sherlee Williams

**5. A description of how comment was solicited from affected businesses, a summary of their response, and an explanation how other interested persons may obtain a copy of the summary.**

Comments were solicited from affected businesses by public workshop and Small Business Impact (SBI) questionnaire. SBI Statement was solicited via email to freelance interpreters and interpreting referral companies. Some businesses speculated that the increased credentialing requirement and 5-year limit on provisional registration would decrease the number of interpreters available. The full summary is attached, see attachment C. Interested persons may obtain a copy of the summary by emailing a request to [InterpreterRegistry@adsd.nv.gov](mailto:InterpreterRegistry@adsd.nv.gov).

**6. If the regulation was adopted without changing any part of the proposed regulation, a summary of the reasons for adopting the regulation without change.**

The permanent regulation was adopted on August 30, 2022, and included all of the changes suggested at the workshop.

**7. The estimated economic effect of the adopted regulation on the businesses which it is to regulate and on the public. These must be stated separately, and each case must include:**

**(a) Both adverse and beneficial effects; and**

**(b) Both immediate and long-term effects.**

(a) Both adverse and beneficial economic effects on regulated businesses:

Adverse effects: These regulations do not regulate businesses.

Beneficial effects: These regulations do not regulate businesses.

Both adverse and beneficial economic effects on the public:

Adverse effects: The Aging and Disability Services Division does not anticipate any adverse/negative economic impacts on the public in the State of Nevada as there are no associated fees.

Beneficial effects: The Aging and Disability Services Division does not anticipate any beneficial economic impacts on the public in the State of Nevada.

(b) Both immediate and long-term economic effects on regulated businesses:

Immediate effects: These regulations do not regulate businesses.

Long-term effects: These regulations do not regulate businesses.

Both immediate and long-term economic effects on the public:

Immediate effects: The Aging and Disability Services Division does not anticipate any immediate economic impacts on the public in the State of Nevada as there are no associated fees.

Long-term effects: The Aging and Disability Services Division does not anticipate any long-term economic impacts on the public in the State of Nevada as there are no associated fees.

**8. The estimated cost to the agency for enforcement of the adopted regulation.**

There is no additional cost to the agency for enforcement of this regulation.

**9. A description of any regulations of other state or government agencies which the proposed regulation overlaps or duplicates and a statement explaining why the duplication or overlapping is necessary. If the regulation overlaps or duplicates a federal regulation, the name of the regulating federal agency.**

There are no other state or government agency regulations that the proposed regulation duplicates.

**10. If the regulation includes provisions that are more stringent than a federal regulation which regulates the same activity, a summary of such provisions.**

There are no federal regulations that apply.

**11. If the regulation provides a new fee or increases an existing fee, the total annual amount the agency expects to collect and the manner in which the money will be used.**

This regulation does not provide a new fee or increase an existing fee.

# ATTACHMENT A

## 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

Steve Sisolak  
Governor

Richard Whitley, MS  
Director



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## NAC 656A PUBLIC WORKSHOP MEETING MINUTES

NOTICE IS HEREBY GIVEN; the Nevada Aging and Disability Services Division held a workshop to consider amendments to Nevada Administrative Code (NAC) Chapter 656A related to the practice of Sign Language Interpreters in Nevada.

The workshop was conducted via virtual meeting platform beginning at 2:00 pm, July 29, 2021, at the following location: [Join Zoom Meeting Online](#), Meeting ID: 991 2051 3066, Passcode: 147914 and via Teleconference 1-253-215-8782. The workshop was conducted in accordance with NRS 241.020, Nevada's Open Meeting Law.

### AGENDA

#### 1. Introduction of workshop

Jennifer Montoya began the introduction of the workshop process and explained virtual meeting logistics.

#### 2. Public comment

No public comment

#### 3. Explanation of the Nevada Revised Statute (NRS) and the Nevada Administrative Code (NAC) 656A.

Jennifer Montoya explained the difference between the NRS and NAC and how the presentation is color-coded to show what changes just occurred with SB179 in the NRS and what the proposed changes are for updating the NAC.

#### 4. Discussion and recommendations on the new minimum standards by regulation

Jennifer Montoya and Kalen Beck outlined the current and proposed changes to NAC 656A. The proposed changes can be found on the PowerPoint presentation [here](#).

#### 5. Public Comment

Andrea Juillerat-Olvera gave a public comment. Ms. Juillerat-Olvera asked about the definition of an educational interpreter in NRS 656A.

Laura Fink gave a public comment. Ms. Fink asked what is the anticipated percentage of drop in available ASL interpreters based on these recommendations?

Paul Maucere gave a public comment. Mr. Maucere stated that he appreciated the opportunity to attend this NAC workshop. He then asked how these proposed changes would affect the available number of interpreters. His concern was that there are not enough interpreters, especially in the Northern and rural areas of the state.

Jamers Speier gave a public comment. Ms. Speier expressed concern for the community provisional classification. She felt the credentialing requirements were too narrow and did not allow for individuals who acquired interpreting skills outside of a formal interpreter training program to register. This includes individuals who are Deaf interpreters.

Lisa Wolf gave a public comment. Ms. Wolf expressed concerns about the proposed requirements for being an approved mentor. She stated that the minimum requirement of being an interpreter in a professional registration classification was not sufficient due to the fact that an interpreter could have recently earned their credentials and would not be appropriate to mentor other interpreters. She suggested that the State increase the requirement to include a minimum number of years in the professional registration classification.

Andrea Juillerat-Olvera gave a second public comment. Ms. Juillerat-Olvera also expressed concern for the educational requirement to increase to a bachelor's degree. She felt that the state has many interpreters who are very qualified to work who do not hold any post-secondary degrees. Ms. Juillerat-Olvera included the cost of continuing education as a barrier for many of the working interpreters in the state.

6. Adjournment at 2:45 pm PDT.

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**Note:** We are pleased to make reasonable accommodations for members of the public who have a disability and wish to attend the meeting. If an accommodation for the meeting is needed, please notify Jennifer Montoya in writing at 3416 Goni Road, Suite D-132, Carson City, NV 89706, via email at [jmontoya@adsd.nv.gov](mailto:jmontoya@adsd.nv.gov) or by video phone at (775) 434-0237 as soon as possible.

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The exiting law requires the Aging and Disability Services Division to adopt regulations to establish qualification requirements and register signed language interpreters and Communication Access Realtime Translation (CART) providers meeting the requirements under NRS 656A.

<https://www.leg.state.nv.us/NRS/NRS-656A.html>

The proposed regulation changes provide provisions for the following:

- 1) Definitions:
  - a. Changes the definition of “mentor.”
  - b. Changes the definition of “community setting.”
  - c. Changes the definition of “primary and secondary setting.”
  - d. Changes the definition of “practice of sign language interpreting.”
  - e. Adds the definition of “postsecondary setting.”
  - f. Adds the definition of “professional development.”

- g. Adds the definition of a “nationally recognized sign language interpreter or transliterator certification”
- 2) Removes:
- a. Registration requirement for Cued Speech Transliterators.
  - b. Some definitions for clarity.
- 3) Changes:
- a. The current seven classifications by reducing them to four classifications and adds a student classification per SB179
    - i. Community Professional
    - ii. Community Provisional
    - iii. Educational Professional
    - iv. Educational Provisional
    - v. Student
  - b. The renewal cycle to annual renewal for all classifications.
  - c. Professional Development and Mentoring hour requirement for non-certified interpreters due to converting to an annual renewal cycle.
  - d. The minimum qualification requirements for Educational classifications per SB179.
  - e. Specific language requiring certification types to “generally recognized national organizations.”
  - f. The substitute limitations for educational interpreters.
  - g. Some language for clarity.
- 4) Adds:
- a. Additional acceptable qualifications for Community classifications.
  - b. Time limit for Provisional classifications per SB179.
  - c. Code(s) of ethics for Community and Educational classifications.
  - d. Qualifications for professional mentors.

Members of the public may make comments at this meeting. Persons wishing to submit written testimony or documentary evidence may submit the material to Jenn Montoya, Social Service Program Specialist II at the following address:

Aging and Disability Services Division  
3416 Goni Road, D-132  
Carson City, NV 89706  
(775) 687-0574 (FAX – Attention: Jennifer Montoya)  
JMontoya @adsd.nv.gov

If you prefer to provide comments in ASL, please leave a SignMail message at (775) 434-0237.



A copy of the notice and the proposed regulations are on file for inspection and/or may be copied at the following locations during normal business hours:

Aging and Disability Services Division  
3416 Goni Road, D-132  
Carson City, NV 89706

Aging and Disability Service Division  
3320 West Sahara Ave.  
Las Vegas, NV 89102

Nevada State Library and Archives  
100 Stewart Street  
Carson City, NV

A copy of the regulations and small business impact statement can be found on-line by going to:  
[http://adsd.nv.gov/Meetings/Meeting\\_Notices/](http://adsd.nv.gov/Meetings/Meeting_Notices/)

A copy of the public workshop notice can also be found at Nevada Legislature's web page:  
<https://www.leg.state.nv.us/App/Notice/A/>

A copy of this notice has been posted at the following locations:

1. Nevada Disability, Advocacy and Law Center, 1875 Plumas Street, #1, Reno, NV 89509
2. Nevada Disability, Advocacy and Law Center, 2820 W. Charleston Blvd., #11, Las Vegas, NV 89102
3. Nevada Disability, Advocacy and Law Center, 905 Railroad Street, #104B, Elko, NV 89801
4. Aging and Disability Services Division, 3416 Goni Rd., Carson City, NV 89706
5. Aging and Disability Services Division, 3320 West Sahara, Las Vegas, NV 89102
6. Aging and Disability Services Division, 9670 Gateway Dr., Ste. 200, Reno, NV 89521
7. Aging and Disability Services Division, 1010 Ruby Vista Dr., Suite 104, Elko, NV 89801

A copy of all materials relating to the workshop may be obtained at the workshop or by contacting the Aging and Disability Services Division, 3416 Goni Road, D-132, Carson City, NV 89706, 775-687-4210, [adsd@adsd.nv.gov](mailto:adsd@adsd.nv.gov).

Per NRS 233B.064(2), upon adoption of any regulations, the agency, if requested to do so by an interested person, either prior to adoption or within 30 days thereafter, shall issue a concise statement of the principal reasons for and against its adoption, and incorporate therein its reason for overruling the consideration urged against its adoption.

# ATTACHMENT B

## DEPARTMENT OF HEALTH AND HUMAN SERVICES

AGING AND DISABILITY SERVICES DIVISION  
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Steve Sisolak  
Governor

Richard Whitley, MS  
Director



Dena Schmidt  
Administrator

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### NAC 656A HEARING MEETING MINUTES

NOTICE IS HEREBY GIVEN that the Communication Access Services program held a public hearing to consider amendments to Chapter 656A of the Nevada Administrative Code (NAC) related to the practice of Sign Language Interpreters in Nevada.

The hearing was conducted via videoconference beginning at 4:00 PM on Tuesday, August 30, 2022, at the following location: Join Zoom Meeting Online, Meeting ID: 836 9759 5128, Passcode: 494722 and via Teleconference 1-669-900-6833. The workshop was conducted in accordance with NRS 241.020, Nevada's Open Meeting Law.

**ADSD Staff:** Jennifer Montoya, Jeff Jaech, Sara Nolan, Kim Johnson, Megan Johnson, Kalen Beck, Adrienne Navarro  
**Accommodations Team:** Jamie Jaramillo, Emily Beech, Becky Van Auken  
**Members of the Public:** Andrea Juillerat-Olvera, Betty Hammond, Dawn Duran, Dawn Lyons, Dena Maurer, Denise Asap sports, Ehren Dei, Ellen Thompson, Gina Gifford, Goldie Kappes, Griselda Navarrete, Hanna Paddack, Hans C Ferguson, Helaina, Joey Hitchcock, Kayla, Kim Ryan, Kitty Edwards, Laura (LT) Thompson, Laura Fink, Lonyae Bigby, Lora Turner, Lyssa Goldsworthy, Marlene Daniel, Michelle (Albrecht) Cordova, Tim Smalley - Nevada Association of the Deaf, Nevada Black Deaf Advocates, Sandra Jackson, Sara Brewer, Shannon Council, Sherlee Williams

### MINUTES

#### I. Call to Order

Jennifer Montoya began the introduction of the workshop process and explained virtual meeting logistics.

#### II. Public Comment

No public comment.

#### III. Discussion of Proposed Permanent Regulations

Jennifer Montoya explained the amendment of regulations that pertain to Chapter 656A of the Nevada Administrative Code. The proposed changes can be found on the registry website at:

[https://adsd.nv.gov/Programs/Physical/ComAccessSvc/Interpreter\\_Registry/Interpreter\\_Registry/](https://adsd.nv.gov/Programs/Physical/ComAccessSvc/Interpreter_Registry/Interpreter_Registry/)

#### IV. Public Comment

Hans Ferguson gave a public comment. Mr. Ferguson expressed the concern that adding additional requirements for interpreters would reduce the workforce. In addition, this could create a barrier for new to the area skilled, proficient, and credentialed interpreters with 20-30 of experience if they do not possess the required degree. They would be precluded from providing services in the state of Nevada. Mr. Ferguson does not believe this will improve the interpreting situation of the state when the community is already in desperate need. Mr. Ferguson believes that requiring a degree in any field will not be beneficial to the interpreting practice, and the state will see a lack of registrants as well as interpreters leaving the field. Mr. Ferguson added that the annual renewal requirement could be problematic as if they are grandfathered into the degree waiver but forget to renew their registration, interpreters will be lost from the field due to these new requirements.

Dawn Lyons gave a public comment. Ms. Lyons agrees that requiring a B.A. degree in any field does not necessarily impact an interpreter's qualifications. Also, that it will create barriers for interpreters to move to Nevada from another state.

Lonyae Bigby gave a public comment. Lonyae stated that they agree with Hans.

Andrea Juillerat Olvera gave a public comment. Ms. Juillerat Olvera is concerned that CODA's (children of deaf adults) will be unable to apply for registration with the change in requirements. She stated that CODA's are highly skilled and are often the best interpreters available but fears their knowledge and expertise will be lost with additional barriers put in place.

Laura Fink gave a public comment. Ms. Fink stated that annual renewal will place an additional burden on administration and is concerned if a plan is already in place for that. Ms. Fink is also concerned that the increased requirements will affect the certified deaf interpreter population from moving to the state, as the state of Nevada does not have many CDIs. Her concern is that this barrier will also prevent deaf individuals from desiring to become interpreters.

Hans Ferguson gave a second public comment. Mr. Ferguson stated that currently k-12 teachers are lacking and to combat the reduced work force, school districts are allowing people without degrees to teach. He stated that with those issues in the educational field, the interpreting field is experiencing something to a similar extent. Mr. Ferguson believes the solution stated here is working in reverse; while there is a lack, the state is raising the standards creating a barrier for those with interpreting skills and talents.

Betty Hammond made a public comment. Ms. Hammond's concern relates to if school districts are bought in to the laws that are being put into place. She stated that raising the requirements will cause a lack of availability and is concerned for who will be paying for interpreters to receive the required training. Ms. Hammond stated that a gap will need to be filled when interpreters leave the field. Also, she asked if the deaf interpreter population will have an exception from this rule or if they will be held to the same standards.

Dawn Duran made a public comment. Ms. Duran stated she understands the need to elevate interpreter skills and the increase is to help support a high level of skill in interpreters, however, the state currently does not have enough interpreters to supply the existing need. Agencies currently are recruiting from out of state to supply the need, and the lack of interpreters is more of a pressing issue than the quality at this time. Ms. Duran supports the philosophy and goals of the CAS program, but priority should be placed on recruitment at this time.

V. Adjournment at 4:41 pm PST

# ATTACHMENT C

## DEPARTMENT OF HEALTH AND HUMAN SERVICES

AGING AND DISABILITY SERVICES DIVISION  
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Dena Schmidt  
Administrator

Steve Sisolak  
Governor

Richard Whitley, MS  
Director



### SMALL BUSINESS IMPACT STATEMENT FOR NAC 656A

The Aging and Disability Services Division has determined that the proposed Nevada Administrative Code change would not have a negative impact on small businesses in Nevada and may deliver positive impact.

A small business is defined in Nevada Revised Statutes NRS 233B as a "business conducted for profit which employs fewer than 150 full-time or part-time employees."

This small business impact statement is made pursuant to NRS 233B.0608 (3) and complies with the requirements of NRS 233B.0609. As required by NRS 233B.0608(3), this statement identifies the methods used by the agency in determining the impact of the proposed regulation on a small business in sections 1, 2, 3, and 4 below and provides the reasons for the conclusions of the agency in section 8 below followed by the certification by the person responsible for the agency.

#### **Background**

Under existing law, the Aging and Disability Services Division is required to establish and maintain a statewide Interpreter / CART registry system and prescribe the requirements for engaging in the practice of interpreting or Communication Access Realtime Translation. To keep up with current changes in the interpreting industry, these proposed NAC regulation changes conform with current best practices and clarify language in the current regulations.

- 1) A description of the manner in which comment was solicited from affected small businesses, a summary of their response and an explanation of the manner in which other interested persons may obtain a copy of the summary.**

Pursuant to NRS 233B.0608 (2)(a), the Aging and Disability Services Division made a concerted effort to determine whether the proposed Nevada Administrative Code is likely to impose an economic burden upon a small business. There is one interpreting service firm located in the State and three other firms that are based out of state but provide services throughout Nevada. On June 22, 2021, all four firms were provided the Small Business Impact Questionnaire, a copy of the proposed NAC changes, and a copy of the recent NRS change via SB179 from the 81<sup>st</sup> Legislative Session.

The questions on the questionnaire were:

1. How many employees are currently employed by your business?
2. Will a specific regulation have an adverse economic effect upon your business?
3. Will the regulation(s) have any beneficial effect upon your business?
4. Do you anticipate any indirect adverse effects upon your business?
5. Do you anticipate any indirect beneficial effects upon your business?

**Summary of Response**

<b>Summary of Comments Received</b> (3 responses were received)			
Will a specific regulation have an adverse economic effect upon your business?	Will the regulation(s) have any beneficial effect upon your business?	Do you anticipate any indirect adverse effects upon your business?	Do you anticipate any indirect beneficial effects upon your business?
NO – 2 YES – 1	NO – 2 YES – 1	NO – 1 YES – 2	NO – 3 YES –
Comments: 1. The change in classifications that will require a EIPA 4.0 for educational interpreters within 5 years, will create additional expense for interpreters in preparation and testing. This will likely result in interpreters raising the rate they charge agencies which will negatively impact our overhead costs. Additionally, there is already a limited bandwidth of interpreters in the state. This new requirement may result in an even greater strain to fill assignments.	Comments: 1. By requiring an eventual EIPA 4.0, we may have an increase in interpreters who can also accept community jobs.	Comments: 1. Limiting the number of years an interpreter can work classified provisionally, may result in interpreters feeling pressure to advance faster than they can resulting in their leaving the profession when Nevada is already in need of more interpreters. This decreases the pool of interpreters that agencies can rely on to meet the need. 2. To accept a community qualified interpreter to work in a legal setting is very dangerous without specific legal training. I strongly suggest that the section that states "community interpreter" have additional language which requires verification of some amount of legal training for any interpreter who accepts legal work (i.e. police, court, CPS, etc.)	Comments: 1. None

**2) Describe the manner in which the analysis was conducted.**

ADSD reviewed the regulation for any impact on small businesses. Individuals who are nationally certified signed language interpreters and who are knowledgeable about the profession, national standards, and best

practices drafted the proposed concepts. Consideration was given to national standards and best practices, and the potential impact on practitioners as well as the best interest of consumers when proposing the regulation changes. Many of the proposed changes are conforming to be able to operationalize the recent NRS 656A changes. All of the comments were on changes that occurred in the last legislative session with SB179, not with our proposed changes to the NAC.

**3) The estimated economic effect of the proposed regulation on the small business which it is to regulate including, without limitation both adverse and beneficial effects and both direct and indirect effects.**

Possible adverse economic effects are speculation and cannot be quantified. Direct beneficial effects include the potential that the regulatory framework may increase participation of interpreters coming into and staying in the field as well as an increase in service quality.

**4) Provide a description of the methods that the agency considered to reduce the impact of the proposed regulation on small businesses and a statement regarding whether the agency actually used any of those methods.**

ADSD considered the impact on small businesses when drafting the proposed changes and after receiving the comments from the survey. The primary goal of these regulations is to meet the needs of consumers utilizing signed language interpreting services and ensuring their access to communication.

**5) The estimated cost to the agency for enforcement of the proposed regulation.**

These regulations will not add any additional costs to the agency.

**6) If the proposed regulation provides a new fee or increases an existing fee, the total annual amount the Aging and Disability Services Division expects to collect and the manner in which the money will be used.**

There are no existing fees and this NAC does not impose any new fees.

**7) An explanation of why any duplicative or more stringent provisions than federal, state or local standards regulating the same activity are necessary.**

The proposed NAC changes do not duplicate or create more stringent provisions than are currently in place.

**8) Provide a summary of the reasons for the conclusions of the agency regarding the impact of a regulation on small businesses.**

The Division's conclusion regarding impact to small business is based on feedback provided by stakeholders. The conclusion is that the proposed regulations would have no negative impact, and that there is a potential for a positive impact as a result of increased number of interpreters entering or staying in the field.

Any other persons interested in obtaining a copy of the summary may email, call, or mail in a request to:

Aging and Disability Services Division  
3416 Goni Road, D-132

Carson City, NV 89706  
Jenn Montoya  
Phone: 775-434-0237  
Email: [JMontoya@adsd.nv.gov](mailto:JMontoya@adsd.nv.gov)

**Certification by Person Responsible for the Agency**

I, Dena Schmidt, Administrator of Aging and Disability Services Division, certify to the best of my knowledge or belief, a concerted effort was made to determine the impact of the proposed regulation on small businesses and the information contained in this statement was prepared properly and is accurate.

Signature:  Date: 7/19/2021