



**NOTICE OF PUBLIC MEETING**

**Date and Time of Meeting:** May 19, 2026 10 AM  
**Name of Organization:** Nevada Applied Behavior Analysis Board  
**Place of Meeting:** Teleconference and NV ABA Office-  
6170 Mae Anne Ave. #1 Reno, NV

*Please place your phone or your computer microphone on mute unless you provide public comment.*

**Join Zoom Meeting**

<https://zoom.us/j/94438699568?pwd=xyHd0VIXTRmEBAPsuLA0wWjbOJtqZU.1>

**Telephone Access:**

**1-669-900-9128**

**Please Note:** The Applied Behavior Analysis Board (ABAB) may (1) address agenda items out of sequence to accommodate people appearing before the Board or to aid the efficiency or effectiveness of the meeting; (2) combine items for consideration by the public body; and (3) pull or remove items from the agenda at any time. The Board may convene in closed session to consider the character, alleged misconduct, professional competence or physical or mental health of a person. See NRS 241.030. Prior to the commencement and conclusion of a contested case or a quasi-judicial proceeding that may affect the due process rights of an individual the board may refuse to consider public comment. See NRS 233B.126. At the discretion of the Chair, public comment is welcomed by the Board, but will be limited to three (3) minutes per person. A public comment time will be available at the beginning of the meeting and then once again prior to adjournment of the meeting. The Chair may allow additional time to be given a speaker as time allows and in his/her sole discretion. Once all items on the agenda are completed the meeting will adjourn.



*Mission Statement: Upholding ethical standards of practice and conduct, the Nevada Board of Applied Behavior Analysis licenses and registers trained professionals, prioritizing consumer protection through regulatory oversight.*

**May 19, 2026 10 a.m. Board Meeting Agenda**

**1. Call to Order, Roll Call of Members, and Confirm Quorum**

**2. Mission Statement- See Statement above**

**3. Public Comment**

No action may be taken upon a matter raised under the public comment period unless the matter itself has been specifically included on the agenda as an item. Comments will be limited to three minutes per person. People making comments will be asked to begin by stating their name for the record and to spell their last name and provide the secretary with written comments. People wanting to make comments during the public comment period, now or in a later public comment period, can participate via the Zoom link or by telephone by calling 669-900-9128. Please note these links and numbers change for each meeting.

**4. Approval of Board Minutes (For possible action)**

- March 17, 2026

**5. Executive Directors Report (Informational only)**

- Board Position Update- Introduction of Lindsay Sang, Community Member
- Future Board Position openings – Two Licensed Professionals
- Licensing Platform transition update
- AGO regarding use of Lobbyists/ The Indy Opinion Piece
- DPS Agency audit concerns- need for training
- Accreditation discussion- an emerging trend
- NvLEND

**6. NABA Update (Informational only)**

**7. Complaints (Informational only)**

- Medicaid investigations/concerns
- Subcommittee consideration
- Investigator status

**8. Financial Update (For possible action)**

- Financial Reports  
March 2026  
April 2026
- Proposed FY 27-28 Budget

**9. Discussion of Current Status of Applications and other Licensing Activities** *(For possible action)*

- 2027 Legislative Session: issues to address
- Proposed Regulations by B&I- Adopted 5/11 – final approval possible June 30. Board response
- Complaint Review Subcommittee
- Nevada Ethics Commission – training requirements, support, review
- CLEAR's International Symposium – Wednesdays in May, Aug, Nov- interest/registration
- Government Affairs contract – discuss process to hire support
- BACB hosted meeting – October 2026. Approval of Board member/ED attendance/expenses
- 2027-29 Renewal Process
  - Discussion regarding change of license cycle
- License/registrations issued: March, April, May to-date
- Consider scheduling June meeting

**10. Determine Future Agenda Items** *(For possible action)*

- Timeline for ED evaluation due October 2026 – process and coordinator

**11. Public Comment**

(No action may be taken upon a matter raised under the public comment period unless the matter itself has been specifically included on an agenda as an action item. Comments will be limited to three minutes per person. People making comments will be asked to begin by stating their name for the record and to spell their last name and provide the secretary with written comments.)

**12. Adjournment**

**NOTE:** We are pleased to provide reasonable accommodation for members of the public who have disabilities and wish to attend the meeting. If special arrangements for the meeting are necessary, please notify Wendy Knorr (775-746-9429) as soon as possible and at least one business day in advance of the meeting. If you wish, you may e-mail her at [executivedirector@nvababoard.org](mailto:executivedirector@nvababoard.org). Supporting materials for this meeting are available at 6170 MaeAnne Ave., Suite 1, Reno, NV 89523 or by contacting Wendy Knorr at 775-746-9429, or by email [executivedirector@nvababoard.org](mailto:executivedirector@nvababoard.org). Agenda and supporting materials posted at these locations and online on the following sites: <https://notice.nv.gov/> [www.nvababoard.org](http://www.nvababoard.org) and NVABA Office.



March 17, 2026 1p.m. Board Meeting- **DRAFT Meeting Minutes**

**1. Call to Order**

The meeting was called to order at 10 a.m. Board members in attendance: Dr. Fronapfel, Christy Fuller, Dr. Saunders, Stephanie Huff, Henna Rasul, AG Counsel and Wendy Knorr, Executive Director.

**2. Mission Statement**

*Stephanie Huff read aloud.*

**3. Public Comment**

There was no public comment

**4. Approval of Board Meeting Minutes** There were no questions or discussions.

**Dr. Saunders** made a motion to approve the January 20, 2026 meeting minutes as presented; **Christy Fuller** seconded the motion, and the motion passed.

**Christy Fuller** made a motion to approve the February 27, 2026 meeting minutes as presented; **Dr. Fronapfel** seconded the motion and the motion passed.

**5. Executive Director's Report**

The Sunset Committee removed NVABA from this session's list of required audits.

**Wendy Knorr** reported that the investigator engaged last Fall resigned from all the Boards he was working with in January. A new investigator has been located in Reno and a potential investigator in Las Vegas. Kim Taitano is retiring from Washoe County in late April and has agreed to work per diem for the Board. In addition, a licensed private investigator indicated he would be interested on a per diem basis.

The Community Member Board position is open after the resignation of Lynda Tache. The individual appointed will complete the remainder of the term which will expire in 2027. **Wendy Knorr** has spoken with two candidates about the position; one has declined to apply at this time due to family responsibilities but indicated she might consider it again when it opens again. A second candidate, Lindsay Sang has indicated she will be applying for the position. The Governor will make the final appointment.

**Dr. Saunders, Stephanie Huff and Wendy Knorr** represented the Board at the National APBA conference held March 13-14 and attended the BACB regulators meeting which was held during the conference. **Christy Fuller** attended the conference as well as a presenter. **Dr. Saunders** stated that she also felt that both meetings were good. She found it interesting that BACB CEO, Dr. Carr, stressed that it was important to remember that the field is young and growing and to impress on new professionals that the profession does not have the same resources available as other more mature, established fields. Impressing that and being upfront with new professionals is important for a more realistic perspective and help prevent burnout and assist them with their professional development. She also felt there was a lot more talk of ACQ accreditation for providers. The thought is that it will be required within the next ten years and it would be wise to start planning now. While the Board currently

does not have authority over the businesses, it would be wise for providers to consider and explore the process now as it could be that it will be required by the State at some time. **Stephanie Huff** mentioned learning about several state's efforts regarding AI technology which is now on her radar and mentioned that the Board may want to address that in the future. The BACB also announced the dates of its first meeting at their offices in Colorado. The meeting will be in October, and the Board should plan to send representation. She also felt that there was more public policy focus offered at this conference. One take away for her was the importance of making legislative relationships prior to needing them and suggests that it is something the Board should work toward for the next session and identify potential legislation beforehand. **Christy Fuller** asked what was shared during the regulators' meeting, as she has previously found those meetings to be very useful. She also stated she agreed with establishing legislative relationships and hopes that others are interested in public policy, and not just specific to licensing, but as ABA profession overall. She highlighted Dr. Carr's presentation of the growth, evolution, and status of the profession. **Stephanie Huff** suggested that the BACB meeting was a bit different than previous meetings as it was just over an hour and more informal. Both Holly from BACB and Muriel from CASP spoke and then there was interaction between the regulators. The topic of AI was brought up along with title protection in law. **Dr. Saunders** agreed there was good information shared among the attendees. One area she believes the Board may see an increase in interest and potential questions is coding. Major changes will go into effect in 2027 and people don't know where to go, so she reminded everyone that the Coding Coalition might be the best place to refer those questions. **Wendy Knorr** said that she feels the relationship/partnership with NABA has great potential and will encourage more interaction to better support each other in assisting with questions and concerns from our stakeholders. **Christy Fuller** encouraged accessing and understanding the BACB's disciplinary process in relation to the Boards. She referenced Holly's presentation at the conference and encouraged access to that session through BehaviorLive. **Wendy Knorr** mentioned that she'll be incorporating information to newly licensed BCaBA's and BCBA's that APBA will provide a one-year membership to encourage networking and professional development.

**Wendy Knorr** reported that the regular meetings required for the LCB audit appear to have come to an end. The LCB team is completing their review of the data provided to them and the report will be reviewed and presented before the end of the year.

B&I requested updated information about the Board's operations which will be compiled and provided to LCB according to them. The information focused on the previous 3 years' finances. We provided update/corrected information to B&I within the prescribed deadline.

A webinar is scheduled regarding the recent changes to ABA insurance coverage in Nevada. Sponsored by the NV Governors' Council on Developmental Disabilities and others.

**Wendy Knorr** reported that the Board's 3<sup>rd</sup> quarter payments and conference expenses will be sent by the end of the month.

#### **6. NABA Update**

No report

#### **7. Complaints**

**Wendy Knorr** reported that as part of the LCB audit, there was a review of complaints and the process. A couple complaints have been received, mirroring issues in the national news. They remain a priority.

#### **8. Financial Update**

January and February 2026 reports were presented for review. **Dr. Fronapfel** made a motion to accept the January and February 2026 reports; **Dr. Saunders** seconded the motion and the motion passed unanimously.

#### **9. Discussion of Current Status of Applications and other Licensing Activities**

**Wendy Knorr** provided information as requested by a licensee, regarding Illinois legislation outlining requirements for agencies/providers of ABA services in the state. They suggested this might be

something for consideration in Nevada. **Wendy Knorr** shared information about experiences working with out-of-state providers and some of the challenges encountered. The Board does not have authority over the businesses, just the licensed individuals working for them. She mentioned as time goes on, this may become an issue the Board may have to consider – some would require statutory changes.

Proposed regulatory changes by B&I will be presented at a hearing March 31 at 10 a.m. The proposed changes were made available to the Board members. These regulations are the first effort from B&I to establish operational standards since the statutes were approved in 2023. **Stephanie Huff** asked if there was any information about how other licensing boards were reacting to the proposed regulations, or any discussion from them? **Wendy Knorr** indicated that her understanding was that most of the boards feel the regulations are mostly restatement of requirements already in place – certain reports and other requirements – and not new requirements. There is some concern about the complaint process and increased access to complaint information without specific justification, but overall, nothing of major concern.

The Board was updated regarding the proposed contract for Albertson Consulting/Big Picture, the new licensing platform. The contract was reviewed with the Board with updated costs/final contract. **Dr. Saunders** made the motion to accept the updated Big Picture contract for submission; **Dr. Fronapfel** seconded the motion and the motion passed unanimously.

Licenses and Registrations issued:

	<u>Jan.</u>	<u>Feb.</u>	<u>March (to date)</u>	<u>State total</u>
RBT	82	75	39	3535
LaBA	3	0	1	50
LBA	13	8	8	781

**Christy Fuller** asked what the timeline was for receiving background criminal history reports. **Wendy Knorr** reported that there is still a learning curve for the new system and understanding more about DPS's process and termination. We are adjusting our process as needed. Learning when to inquire about a potential problem, etc. to minimize any potential delays. Most reports are received without incident, and the process is much improved over the previous one. **Christy Fuller** emphasized that organizations should incorporate that into their hiring process – if an applicant has not heard back about their results within 2 weeks of submission, they should reach out to inquire.

#### 10. Determine Future Agenda Items

End of fiscal year is June 30, 2026, so a new budget will be presented for review and approval. **Christy Fuller** made the motion to include the review of the FY27-28 budget in addition to the standing agenda items for the next meeting's agenda. **Dr. Saunders** seconded the motion and the motion carried unanimously.

#### 11. Public Comment

**Veronica Smith** presented information about the recent OIG report which stated \$77.8 improper Medicaid payments for ABA services in Colorado which will undoubtedly increase scrutiny of the ABA field. While concerning, it also presents an opportunity for providers to recommit to quality and ethical standards. She encourages providers to consider working with CASP and the benefits of accreditation and involvement with the organization. She also mentioned the conference being held in Las Vegas.

#### 12. Adjournment

**Stephanie Huff** adjourned at 10:54 a.m.

CRAIG A. NEWBY  
*First Assistant Attorney General*

AARON D. FORD  
*Attorney General*

LESLIE NINO PIRO  
*General Counsel*

CHRISTINE JONES BRADY  
*Assistant Attorney General*



HEIDI PARRY STERN  
*Solicitor General*

STATE OF NEVADA  
OFFICE OF THE ATTORNEY GENERAL

1 State of Nevada Way, Suite 100  
Las Vegas, Nevada 89119

March 20, 2026

OPINION NO. 2026-03

BOARDS & COMMISSIONS; FIRST  
AMENDMENT ACTIVITIES; FUNDS;  
GOVERNOR; LEGAL OPINIONS;  
LEGISLATURE; LOBBYING; PUBLIC  
BODIES; REGULATIONS; Title 54  
agencies must ensure that any mandatory  
fees or dues imposed on members are used  
for activities germane to their regulatory  
purposes. While Title 54 agencies may thus  
hire or contract with lobbyists, they may  
only do so for activities germane to those  
agencies' purposes. In addition, the  
Governor cannot direct Title 54 agencies to  
lobby for initiatives or policies that are not  
germane to the executive agency's purpose.

Kristopher Sanchez  
Director  
Department of Business and Industry  
2300 West Sahara Avenue, Suite 770  
Las Vegas, Nevada 89102

Dear Director Sanchez,

Pursuant to NRS 228.150, you have requested an opinion from this office regarding the ability of Title 54 agencies, which regulate the professional competence of their members, to hire or contract with lobbyists. You have also inquired regarding the impact of prior published opinions of this office, including the most recent 1991 Opinion of the Office of Attorney General, No. 91-5, on that issue. This letter addresses those questions.

### QUESTION

Whether Title 54 agencies, which regulate the professional competence of their members and are (at least in part) funded by their membership fees, may hire or contract with lobbyists?

### SHORT ANSWER

Given that Title 54 agencies are in part funded by mandatory membership fees, the lobbying activities by such agencies must be specifically germane to the goals of regulating the professional competence of their members (*e.g.*, discipline and continuing education). Any other forms of lobbying using such funds, such as ideological or political lobbying, would be prohibited by the First Amendment. For this reason, a Title 54 agency also should not lobby for the agency's continued existence or for the specific structure of its governance, which also may not be consistent with the political preferences of some of its constituent members.

### ANALYSIS

The United States Supreme Court has held that, while states may require attorneys to join an integrated bar and pay mandatory dues as a condition of practicing law, the use of those dues is subject to First Amendment limitations. *See Keller v. State Bar of California*, 496 U.S. 1 (1990); *see also Ellis v. Bhd. of Ry., Airline & S.S. Clerks, Freight Handlers, Express & Station Emps.*, 466 U.S. 435, 455 (1984) (recognizing that "[t]he First Amendment does limit the uses to which the union can put funds obtained from dissenting employees").

In *Keller*, a forced group speech case, the Supreme Court made clear that mandatory dues may only fund activities germane to the state bar's interest in regulating the legal profession and improving the quality of legal services. 496 U.S. at 14. Similarly, in other forced group speech contexts, the Court has reviewed the challenged expenditures to determine whether the specific action is germane to the challenged association's purpose. *See, e.g., Ellis*, 466 U.S. at 448-55 (reviewing challenged union activities to determine whether those expenditures are "necessarily or reasonably incurred for the purpose of performing the duties of an exclusive representative of the employees in dealing with the employer on labor-management issues").

Pursuant to this Supreme Court precedent and cases following that precedent, mandatory dues may be used to fund expenditures germane to an association's constitutionally relevant purpose. *See, e.g., Kingstad v. State*

*Bar of Wis.*, 622 F.3d 708, 714-16 (7th Cir. 2010) (collecting cases). While “[t]he political or ideological nature of the speech factors into” that analysis, the “key” question is whether the challenged expenditure is germane to the association’s purpose. *Id.* at 716; *see also Ellis*, 466 U.S. at 448-55 (determining whether challenged expenditures were germane to a union’s purpose without focusing on whether the challenged expenditures were political or ideological). As a corollary principle, activities of a political or ideological nature that are not germane to these goals cannot be funded with mandatory dues, as this would infringe upon dissenting members’ First Amendment rights. *See Keller*, 496 U.S. at 14; *Ellis*, 466 U.S. at 448.

The principles established in *Keller*, *Ellis*, and their progeny are directly relevant to Title 54 agencies in Nevada, as they are typically financed by membership fees, at least in substantial part. Title 54 agencies are enumerated in NRS 232.8415. These boards have been placed under the purview of the Department of Business and Industry by operation of NRS Chapter 232. *See* NRS 232.8415(2); *see also* NRS 232.8413.

Title 54 agencies must ensure that any mandatory fees or dues imposed on members are used for activities germane to their regulatory purposes. While Title 54 agencies may thus hire or contract with lobbyists, they may only do so for activities germane to those agencies’ purposes. For example, lobbying activities related to licensing, enforcement of professional standards, or public education about the profession would likely be permissible. *See Keller*, 496 U.S. at 16 (“[P]etitioners have no valid constitutional objection to their compulsory dues being spent for activities connected with disciplining members of the Bar or proposing ethical codes for the profession.”).

On the other hand, using any portion of mandatory dues to lobby for political or ideological initiatives that are not necessary to or reasonably incurred for the boards’ regulatory functions would violate dues-paying members’ First Amendment rights. *See id.* (recognizing, in the context of a state bar association, that “[c]ompulsory dues may not be expended to endorse or advance a gun control or nuclear weapons freeze initiative”). As recognized by the Supreme Court in *Keller*, transparency and accountability in the use of mandatory dues is of crucial importance.

These limitations are consistent with AGO 91-5.<sup>1</sup> There, relying on the Nevada Lobbying Disclosure Act<sup>2</sup> and various persuasive authority, this

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<sup>1</sup> AGO 91-5 reversed AGO 90-17. *See* AGO 91-5 at n.2.

office concluded that “[t]he authority [for executive agencies] to lobby the Legislature can reasonably be found in both the express and implied provisions of the Nevada statutes.” AGO 91-5 at 3. The restructuring of the Title 54 boards under the Department of Business and Industry does not obviate AGO 91-5’s analysis, nor has there been an intervening change in the law that affects this office’s prior analysis.

AGO 91-5, however, did not address whether the Executive Branch may limit the authority of executive agencies to retain lobbyists or otherwise control the lobbying of executive agencies. Generally, “[t]he supreme executive power” lies with the Governor. Nev. Const. art. 5, § 1. But that power does not allow the Governor to “disregard acts of the Legislature,” as the Governor “has a constitutional duty to see that the laws enacted by the legislature are faithfully executed.” *State of Nev. Emps. Ass’n, Inc. v. Daines*, 108 Nev. 15, 20-21, 824 P.2d 276, 279 (1992).

Thus, if the Legislature, through statute, gives an executive agency the express authority to hire lobbyists or to otherwise engage in lobbying, the Governor could not curtail that authority through issuing a general executive policy. If, however, the executive agency lacks explicit statutory authority to hire a lobbyist or engage in lobbying, then the Governor may issue formal executive policies that curtail the implicit authority to engage lobbyists or otherwise limit or direct the executive agency’s lobbying activities. Regardless, as explained above, the Governor, at minimum, cannot direct Title 54 agencies to lobby for initiatives or policies that are not germane to that executive agency’s purpose.

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<sup>2</sup> Since AGO 91-5 was issued, the act was recodified as NRS 218H.010 through NRS 218H.960.

CONCLUSION

Title 54 agencies may lobby for actions germane to the agency's constitutionally relevant purpose. However, if the Title 54 agency lacks explicit statutory permission to engage lobbyists or otherwise lobby directly, the Governor may issue formal executive orders that curtail the agency's implicit authority to lobby. Regardless, the Governor cannot direct Title 54 agencies to lobby for issues or initiatives that are not germane to that agency's purpose.

AARON D. FORD  
Attorney General

By:   
DANIEL R. BRADY  
Deputy Solicitor General

# INDY VOICES



# INDY VOICES

## OPINION: Nevada's occupational boards are a secret welfare program

Candidates for governor don't agree on much, but they do agree on the need to rein in the state's occupational licensing boards. It's long overdue.



David Colborne April 21st, 2026 at 2:00 AM

Opinion

Republican Gov. Joe Lombardo's issues with Nevada's sprawling body of boards and commissions — the 300 or so civilian-run bodies that provide recommendations and oversee professional licensing requirements across the state — are already well-known.

During the 2023 session, his administration submitted [SB431](#) — a wide-ranging bill that, among other things, [established an oversight office](#) over many of the state's occupational licensing boards.

Then in 2025, the Department of Business and Industry followed up with [SB78](#), an ambitious bill which sought to consolidate and increase oversight over several boards. Due to its broad scope, it faced swift opposition from



*Students work in a cosmetology classroom during a tour of Southeast Career Technical*

Academy in Las Vegas on Dec. 11, 2024. boards — which, unlike most state agencies, can hire contract lobbyists to ~~David Blak/The Nevada Independent~~ Democrats. Though Senate Democrats later responded with their own bill, it shared the same fate as SB78 and never passed.

In March, however, the attorney general's office — led by Democratic gubernatorial front-runner Aaron Ford — issued a general opinion regarding the ability of such boards to hire or contract with lobbyists. In it, the office states that, since boards collect mandatory membership fees from practitioners of regulated occupations, lobbying activities by such boards must be restricted to the statutory goals of the board. Ideological or political lobbying — or, presumably, hiring high-ranking party officials for do-nothing, make-work jobs as the Nevada State Board of Dental Examiners did in 2019 — is likely prohibited by the First Amendment.

Then in April, Democratic gubernatorial underdog candidate Alexis Hill weighed in as well with a plan to simplify state licensing requirements for veterans whose service includes health care, law enforcement, commercial driving or other work experience.

Though Ford's direct support for his office's opinion is unknown and Hill's call for simplification is narrow, it's still encouraging to see that reforming the state's steadily accreting body of boards and commissions enjoys enough bipartisan support for politicians to avoid being actively opposed to it.

Though the opinion issued by the attorney general's office was limited solely to lobbying activities by occupational licensing boards and commissions, its ramifications could prove significant. According to consultant activity reports submitted to the Interim Finance Committee, licensing boards spent more than \$400,000 on lobbying during the 2025 legislative session:

Licensing Board	2025 Lobbying January-June
The Nevada State Board of Accountancy	\$12,000.00
Board of Examiners for Alcohol, Drug and Gambling Counselors	\$20,000.00

The State Board of Architecture, Interior Design and Residential Design	\$6,875.00
The State Contractors Board	\$72,000.00
The State Board of Cosmetology	\$30,000.00
The Board of Dental Examiners of Nevada	Did not report by due date
The Board of Dispensing Opticians	Did not report by due date
The Nevada Board of Homeopathic Medical Examiners	Did not report by due date
The Board of Massage Therapy	\$18,000.00
The Board of Medical Examiners	\$39,279.96
The State Board of Nursing	\$28,000.00
The Board of Occupational Therapy	\$21,000.00
The Nevada State Board of Optometry	\$20,000.00
The State Board of Oriental Medicine	\$6,000.00
The State Board of Osteopathic Medicine	\$22,500.00
The State Board of Pharmacy	\$18,000.00
The Nevada Physical Therapy Board	\$24,000.00
The State Board of Podiatry	\$13,800.00
The State Board of Professional Engineers and Land Surveyors	\$12,159.00

The Board of Examiners for Social Workers	\$17,000.00
Speech-Language Pathology, Audiology and Hearing Aid Dispensing Board	\$18,000.00
The Nevada State Board of Veterinary Medical Examiners	\$6,000.00
<b>Total</b>	<b>\$404,613.96</b>

Source: Nevada Legislature's Interim Finance Committee, Aug. 13, 2025, IFC Meeting Packet Volume III, Item N.9(b)

For many boards, the largest consulting expense reported to the Legislature was for "government affairs," "legislative services" and other euphemisms for paying someone to lobby the branch of government responsible for writing the laws each board is supposed to follow.

The Nevada State Contractors Board, for example, reported spending \$72,000 on "public relations outreach and representation." The Board of Optometry's sole contracting expense was \$20,000 for a "government affairs/legislative services consultant." The Board of Cosmetology also only reported one contracting expense — \$30,000 to Western Public Affairs, a lobbying firm co-founded by former Assm. William Horne (D-Las Vegas), in exchange for "lobbyist services."

This, of course, is nothing new. As *The Nevada Independent* reported in 2019, boards in the aggregate regularly spend hundreds of thousands of dollars on professional lobbyists each year.

What is new, however, is that the efforts first established in 2023 to hold boards to the same level of transparency applied to every other state agency are finally starting to come into focus. For the better part of a year, the Office of Nevada Boards, Commissions, and Councils Standards has been working on draft regulations that should hold these public bodies accountable — and these boards are, in fact, public bodies. If they weren't, they wouldn't exist in statute, nor would they have the legal authority to set and collect mandatory licensing fees from Nevada's workforce.

One proposed regulation, for example, requires each board to maintain a website. Those of you who remember my columns about general improvement districts in November and December may remember that, after it was discovered that several districts did not have an online presence, the Legislature passed a law requiring districts to maintain one. General improvement districts, however, are not the only statutory castoffs struggling to meet even this basic

requirement for public administration and transparency — the website for the Nevada Board of Homeopathic Medical Examiners, for example, has been down since December and, the last time I checked, redirects to an Indonesian online slot machine company.

Another proposed regulation requires board members to attend and participate in board meetings. If you're wondering why this wasn't required before now, well, that's a great question because it's still not required — the regulation hasn't been adopted yet and likely won't be adopted until June at the absolute earliest.

Since proposed regulations have to be approved by the Legislature, however, the process of developing and adopting these regulations creates yet another opportunity for Nevada's boards and commissions to continue to funnel money from Nevada's struggling professional workforce to well-connected lobbyists.

If the actions and statements of Nevada's gubernatorial candidates are any indication, however, perhaps there's hope that this taxpayer-funded welfare program for former legislators will come to an end soon — regardless of whom we ultimately elect to occupy the governor's mansion in November.

*David Colborne ran for public office twice. He is now an IT manager, the father of two sons and a recurring opinion columnist for The Nevada Independent. You can follow him on Mastodon @DColborne@techhub.social, on Bluesky @davidcolborne.bsky.social, on Threads @davidcolbornenvor email him at david@colbornemmx.com. You can also message him on Signal at [dcolborne.64](mailto:dcolborne.64).*

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**From:** NvLEND <nced@unr.edu>  
**Sent:** Thursday, April 30, 2026 3:00 PM  
**To:** executivedirector@nvababoard.org  
**Subject:** Now Accepting Applications: NvLEND 2026–27 Training Program

x

## **Now Recruiting: NvLEND 2026-27 Trainees!**

**Application due May 13, 2026 by 5:00pm**

The Nevada Leadership Education in Neurodevelopmental and Related Disabilities (NvLEND) program is pleased to announce the recruitment of **14 trainees** from diverse professional disciplines across Nevada for the **2026–27 training year (September 1, 2026 – June 30, 2027)**.

NvLEND is designed to improve the health and well-being of infants, children, and adolescents with autism and other developmental disabilities by preparing practicing professionals, graduate students, parents, and self-advocates to assume leadership roles within their respective fields. The program emphasizes interdisciplinary collaboration and the development of advanced clinical and leadership competencies.

[Learn more about NvLEND](#)

Trainees will complete a **minimum of 325 hours of training** over one year, including:

- *Interdisciplinary didactic seminars*
- *Clinical experiences*
- *Leadership development projects*

The NvLEND program is led by the **Nevada Center for Excellence in Disabilities (NCED)**, housed within the **University of Nevada, Reno College of Education and Human Development**, and is conducted in collaboration with faculty from the University of Nevada, Reno; the University of Nevada, Las Vegas; and community professionals across healthcare and education disciplines.

## **Business**

### **The ABA Billing Fraud Playbook: The 7 Schemes That Keep Appearing in Federal Indictments**

Ghost sessions, forged signatures, credential laundering, kickbacks for patient recruitment - the same fraud patterns appear in DOJ charging documents and OIG audit findings from Minnesota to Massachusetts to Connecticut. A forensic breakdown of each scheme: how it works, how it hides, how investigators find it, and what compliant programs must do to stay clear.

#### **Why ABA Became a Target**

**WASHINGTON, D.C.** – In March 2026, The Wall Street Journal published an investigation titled “The Boom in Autism Therapy Is Medicaid’s Fastest-Growing Jackpot,” reporting that direct Medicaid payments to ABA providers more than tripled from \$660 million in 2019 to \$2.2 billion in 2023. The piece described providers billing rates as high as \$800 per hour for therapy delivered by workers with high school diplomas, and documented a provider in Indiana that collected \$29 million from Medicaid in 2023 to treat 84 patients — roughly \$340,000 per child. The report was a public crystallization of what federal and state investigators had been documenting in enforcement actions for years.

The conditions that created the ABA Medicaid fraud problem are now well established. Between 2014 and 2022, every state Medicaid program extended coverage to ABA therapy for children with autism. Spending expanded rapidly. Regulatory infrastructure — documentation standards, oversight processes, post-payment review capacity — did not keep pace. Indiana, which had \$14.4 million in ABA FFS spending in 2017 and \$611 million in 2023, is the extreme example but not the only one. The Benesch law firm, in a March 2026 compliance alert summarizing the WSJ findings and OIG audit wave, described the ABA landscape as characterized by rapid growth, inconsistent oversight, and “conditions ripe for overbilling, compliance failures and in some cases outright fraud.”

Into that environment came a range of actors: established clinical providers scaling too fast, private equity-backed platforms with financial pressure to maximize revenue, opportunists with no clinical background who recognized Medicaid as an unguarded revenue source, and, in the most egregious cases, organized fraud operations that had no intention of providing clinical services at all. The seven schemes described below are drawn directly from DOJ charging documents, state attorney general indictments, OIG audit findings, and Medicaid Fraud Control Unit enforcement actions from 2019 through 2026. They are not hypothetical risk scenarios. They are patterns federal investigators have now seen repeatedly enough to recognize on sight.

## **Scheme 1: Ghost Sessions — Billing for Services Never Rendered**

The most basic and most prevalent fraud pattern in ABA Medicaid prosecutions is the ghost session: billing for therapy that never happened. The client is real, the diagnosis is real, the provider is enrolled, and the claim is submitted — but no one showed up and no service was delivered. Ghost sessions appear in every major ABA fraud prosecution in the current enforcement wave.

The Massachusetts Attorney General's June 2025 indictment of Patrice Lamour and her Randolph, Massachusetts companies — Lamour by Design (LBD) and Lamour Community Health Institute (LCHI) — alleged that staff were directed to bill for services to members that were not provided, including sessions billed on holidays and after clients had explicitly canceled or terminated services. Investigators found that LBD had billed for ABA sessions during periods when the only licensed supervisor on staff — the only clinician who could legally supervise the service — was not present and stated he had not performed those services. The indictment charged more than \$1 million in false claims to MassHealth.

The Connecticut federal indictment in January 2025 of Apellaniz and Aponte at Minds Cornerstone LLC alleged \$1.8 million in false ABA claims to Connecticut Medicaid over three years. The charging document described a provider who had already been convicted in state court for Medicaid fraud against a different provider, received that state sentence, was released, and then allegedly opened a new entity and resumed submitting false ABA claims. Ghost session fraud is detected through claims anomaly analysis — a session billed on a date a client was hospitalized, a session billed on a day the facility was closed for a holiday, a session billed the same day a termination letter was sent. The detection challenge is that these discrepancies require cross-referencing data sources that payers and state Medicaid programs do not always integrate in real time.

**What compliance programs catch:** Claims submitted on holidays, weekends, or dates inconsistent with documented client schedules. Billing volume that exceeds what a single therapist could physically have delivered.

**What compliance programs miss:** Ghost sessions fabricated to match a plausible schedule, with session notes also fabricated. Without site visits or independent client contact, the fraud is invisible to a documentation review.

## **Scheme 2: Credential Laundering — Services Rendered by Unqualified Staff**

ABA CPT codes carry different reimbursement rates based on the credential level of the rendering provider. CPT 97155, adaptive behavior treatment with protocol modification, requires a qualified healthcare professional such as a BCBA and reimbursed at rates substantially higher than technician-delivered services. Credential laundering is the

practice of submitting claims as if a qualified provider rendered the service when an unqualified individual — often an RBT, a family member, or a person with no clinical training at all — actually delivered it.

The Minnesota enforcement wave has produced the clearest documented examples. Federal prosecutors' charging documents in the Smart Therapy Center and Star Autism Center cases described behavioral technicians who were often young adult relatives of owners, with no autism-related clinical training, delivering what was billed as licensed BCBA-supervised ABA. According to the Sanford Heisler Sharp McKnight legal analysis of the Minnesota charges, prosecutors alleged that unqualified staff delivered services while claims were submitted under qualified provider credentials, with supervisory documentation forged or fabricated to suggest appropriate oversight had occurred.

The Colorado OIG audit (February 2026) identified a structural version of this scheme: auditors estimated that as many as 1,500 to 2,000 behavioral technicians in Colorado were working without the mandated 40-hour training, competency check, and required supervision — even though the state listed more than 6,600 certified technicians overall. This is not individual fraud by a rogue provider. It is a systemic failure in which the credential infrastructure is real but the actual training and supervision it certifies is absent. Claims submitted for services delivered by these technicians are, technically, claims for services by unqualified staff.

**What compliance programs catch:** NPIs on claims that do not match the credential required for the billed code. Providers billing 97155 with a credential that cannot support that code.

**What compliance programs miss:** Cases where a qualified provider's NPI is used to submit claims but that provider did not actually render or supervise the session. Requires cross-referencing NPI enrollment data with session documentation.

### **Scheme 3: Kickbacks and Patient Recruitment Schemes**

Federal ABA fraud cases have increasingly featured Anti-Kickback Statute violations — providers paying cash, recurring monthly stipends, or other inducements to parents, care coordinators, or referral sources in exchange for enrolling clients in the provider's Medicaid program. This scheme is particularly damaging because it corrupts the enrollment pipeline rather than just the billing, and because it frequently draws into the fraud scheme parents who may initially believe they are simply receiving financial assistance.

The Smart Therapy Center case in Minnesota is the most documented example in ABA specifically. According to the U.S. Attorney's Office for Minnesota, Asha Farhan Hassan, who owned Smart Therapy Center, paid kickbacks of \$300 to \$1,500 per month to parents

to recruit children into the program — including children who were not diagnosed with autism. Hassan also hired unqualified staff, billed for services not provided, and submitted false documentation. Smart Therapy obtained over \$14 million from Minnesota Medicaid between 2019 and 2024 before federal prosecutors charged the scheme and Hassan pleaded guilty in December 2025.

The broader pattern in Minnesota involved 700% growth in EIDBI autism program providers between 2018 and 2023, from 41 providers to over 300. A January 2026 Optum analysis commissioned by the Minnesota Department of Human Services reviewed \$9.4 billion in claims from 2022 to 2025 and identified \$703 million specifically tied to autism centers in which over 90% of EIDBI claims did not align with rules. The kickback component in many Minnesota cases was intertwined with false billing: patients were recruited with cash payments, enrolled without valid diagnoses or referrals, and then billed for sessions that either were not delivered or were delivered by unqualified staff.

**“ABA therapy was an area of behavioral health where fraud and abuse is rampant. [My unit was] often seeing fraud warranting criminal charges, most often in cases where providers were billing for services that were never actually provided to patients.” — Kevin Lownds, Division Chief, Medicaid Fraud Control Unit, Massachusetts Attorney General’s Office, AHLA Fraud and Compliance Forum (2025)**

**What compliance programs catch:** Unusual referral source concentration. Client intake volume spiking without corresponding marketing or clinical expansion. Clients enrolled without a valid diagnostic evaluation on file.

**What compliance programs miss:** Cash kickbacks paid outside the billing system. Referral payments routed through third parties. Requires active monitoring of referral patterns and intake documentation, not just claims data.

#### **Scheme 4: Group Billed as Individual — CPT Code Upcoding**

CPT code 97153 covers one-on-one adaptive behavior treatment by a technician, billed per 15-minute unit. CPT code 97154 covers group adaptive behavior treatment for two or more patients simultaneously. The reimbursement differential is meaningful: individual treatment codes pay at materially higher rates per unit than group codes. The upcoding scheme involves delivering group sessions — one technician serving multiple clients in the same room at the same time — while billing 97153 for each client as if they each received individual one-on-one treatment.

The HHS-OIG Indiana audit found this pattern explicitly. The audit report stated that some sampled enrollee documentation reflected group therapy sessions for which providers had billed CPT codes for individual therapy. The Cotiviti FWA Insights report on ABA fraud

patterns cited a specific case in which a provider of autism services was found to have billed ABA services to individual children when the services were being provided to groups. The financial magnitude of this scheme scales with session volume: a provider running six children simultaneously through a group session and billing each as individual 97153 is extracting approximately six times the allowable reimbursement for the actual service delivered.

This scheme is particularly common in center-based settings where staff ratios and room configurations allow multiple clients to be served simultaneously. It is also one of the easier schemes to detect through claims analytics: a single technician whose NPI appears on concurrent 97153 claims for multiple different clients at the same time-of-day stamps cannot have provided individual one-on-one treatment to all of them simultaneously. Claims analytics systems that flag concurrent billing by the same rendering provider represent the primary detection mechanism.

**What compliance programs catch:** Concurrent 97153 billing by the same NPI for multiple clients at overlapping times. Ratio of 97153 to 97154 claims that is implausibly high for the center's documented staffing levels.

**What compliance programs miss:** Group sessions run sequentially rather than concurrently, each billed as individual. Harder to detect without session scheduling data.

### **Scheme 5: Historical and Template Billing — Billing Based on Schedule Rather Than Actual Services**

Historical billing — submitting claims based on an authorized treatment schedule rather than services actually delivered — is one of the most operationally embedded fraud patterns in the ABA space. It typically begins not as outright fraud but as a compliance shortcut: instead of documenting each session individually, staff submit claims based on the prior authorization schedule, “template” session notes, or historical averages. Over time, the practice normalizes. Sessions that did not occur get billed because the schedule said they should have occurred.

The Massachusetts indictment of Lamour by Design is one of the clearest prosecutorial descriptions of this scheme. According to the indictment, employees were instructed by owner Patrice Lamour to “bill based on historical data — rather than actual services rendered — and to falsify documentation to suggest that services had occurred when they had not.” This is the transition from billing error to fraud: when management provides explicit instructions to substitute historical data for actual documentation, the act of submission becomes a knowing false claim rather than a record-keeping mistake.

The Indiana ABA audit found a related variant: billing that included time within sessions that was not therapeutic — meals, bathroom breaks, transitions — billed continuously without adjustment. The OIG noted that most session notes for sampled enrollee-months documented ABA time billed continuously without accounting for non-therapy time within sessions. In some cases, this reflects standard operational negligence. In others, it reflects a systematic practice of billing the full authorized window regardless of how many of those minutes involved actual ABA.

**What compliance programs catch:** Claims volume matching authorized hours exactly, month after month, regardless of client absences or staff changes. Session notes that are word-for-word identical across dates (template notes). Billing on documented absences.

**What compliance programs miss:** Historical billing with plausible variation introduced artificially. Requires periodic sampling of session notes against attendance records and staff scheduling.

### **Scheme 6: Document Falsification and Forged Signatures**

Document falsification is the operational enabler of most other ABA fraud schemes. Ghost sessions require fabricated session notes. Historical billing requires session notes that do not reflect what actually happened. Credential laundering requires falsified supervision documentation. Where document falsification becomes a separately chargeable scheme is when it involves the deliberate alteration of clinical records, the forgery of provider signatures, or the fabrication of diagnoses and treatment referrals.

The Connecticut federal indictment described providers who fabricated documentation to support ABA claims. The Minnesota cases documented forged approvals and signatures on clinical records. The Cotiviti audit cited a case in which, upon appeal review, investigators found “altered psychological reports, altered plans of care, amended notes, and other documentation that did not clearly identify the changes made to the documents.” The Massachusetts Lamour indictment specifically charged that employees falsified documentation to suggest services had occurred when they had not — a description of systematic record fabrication at the direction of management.

In the OIG audit context, document falsification often takes a subtler form. The Indiana audit found session notes that did not contain the narrative content required to support the CPT code billed — but the notes existed, were dated, and were signed. Whether those are inadequate documentation (compliance failure) or fabricated documentation (fraud) depends on what the provider actually did versus what the note records. The line between documentation deficiency and document falsification is legally significant: deficiency can

result in recoupment and corrective action; falsification can result in criminal prosecution under the False Statements statute (18 U.S.C. § 1001) and obstruction charges.

**What compliance programs catch:** Signatures that do not match the provider's actual signature on file. Session note timestamps inconsistent with provider's documented location or schedule. Notes with identical language across different providers or dates.

**What compliance programs miss:** Systematic falsification conducted uniformly across a provider organization. Requires forensic review, whistleblower reports, or external audit with site visits.

### **Scheme 7: Medically Unnecessary Services and Inflated Hours**

The least legally clear-cut category of ABA fraud — but one increasingly central to the enforcement narrative — is billing for services that were provided but were medically unnecessary, or billing authorized hours at intensity levels not supported by clinical need. This scheme occupies the space between fraud and aggressive utilization, and it is driving much of the regulatory response that is reshaping the industry.

The Wall Street Journal investigation documented that Piece by Piece Autism Centers in Indiana billed Indiana Medicaid \$29 million in 2023 for 84 patients, with reimbursements that at times reached \$640 per hour. One Indiana provider advocacy document cited rates of \$900 or more per hour during the period when Indiana reimbursed at 40% of billed charges. The Benesch compliance alert described investigators finding that some providers billed 30 to 40 therapy hours per week for nearly every child, despite clinical expert guidance that such intensive schedules are rarely clinically necessary and are not appropriate for all patients regardless of diagnosis. In audits, the OIG flagged at least one case in which a child was receiving more than seven hours of ABA five days per week at age eight, with no updated clinical justification for that intensity level on file since the child was four.

Unlike ghost sessions or credential laundering, inflated hours schemes are difficult to prosecute criminally because the services were actually delivered. The legal liability attaches to whether the clinical justification — the BCBA's treatment plan, the medical necessity determination, the prior authorization documentation — honestly reflects clinical need or was engineered to maximize billable hours. In a system where BCBA's receive no formal training in how to determine service hours (a 2026 ABA Matrix survey found that 80% of BCBA's report having no formal training on this), and where business models financially incentivize maximum hours, the line between clinical judgment and financially motivated over-prescription is contested ground. Federal enforcement is

beginning to treat the most extreme cases as the former while states are responding to the aggregate problem through rate cuts and lifetime caps.

*“In Indiana and across the country, certain bad actors have taken advantage of weak oversight and flawed reimbursement structures to generate extraordinary payments through excessive or inappropriate billing practices.” — The Arc of Indiana, responding to the Wall Street Journal investigation (March 2026)*

**What compliance programs catch:** Hours prescribed uniformly across all clients without individualized clinical justification. Treatment plans written to justify authorized maximums rather than clinical need.

**What compliance programs miss:** Overservice that is internally consistent and clinically rationalized but driven by financial rather than clinical incentives. Requires independent clinical review, not billing analytics alone.

### **What Compliance Programs Can and Cannot Do**

The seven schemes above exist on a spectrum from criminally obvious to structurally ambiguous. Ghost sessions with fabricated notes, kickbacks for patient recruitment, and forged signatures are fraud by any definition. Historical billing, group-as-individual upcoding, and inflated hours exist on a continuum where the same act can be negligent compliance failure or deliberate fraud depending on whether management had knowledge and intent. Medically unnecessary services sit in contested territory where clinical judgment, business incentive, and legal liability intersect in ways the industry is still working out.

A compliance program built around claims analytics can detect concurrent billing anomalies (Scheme 4), billing-on-holidays patterns (Scheme 1), and credential mismatches (Scheme 2) before a federal auditor does. A program with session note auditing can catch template billing (Scheme 5) and identify documentation gaps. A program with intake monitoring can flag referral concentration patterns that may indicate kickbacks (Scheme 3). A program with independent clinical review can identify inflated hours (Scheme 7). None of these, without site visits and direct client contact, can reliably detect document fabrication (Scheme 6) when it is conducted systematically across an organization.

The enforcement environment of 2026 has made ABA compliance a board-level issue rather than a back-office function. The OIG has now found billing problems in 100% of sampled claims across four audited states. The DOJ has active ABA fraud prosecutions in Minnesota, Massachusetts, Connecticut, and Minnesota. State MFCUs in at least a dozen states have publicly identified ABA as a fraud enforcement priority. The Medicaid Fraud

Control Unit chief from the Massachusetts AG's office has stated on the record that his unit was regularly seeing ABA fraud warranting criminal charges. Providers who have treated compliance as an administrative formality now face a landscape in which that posture carries material legal risk — not only in audit-triggered recoupment, but potentially in False Claims Act exposure and criminal prosecution.

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## AT A GLANCE

**Scheme 1 — Ghost sessions:** Billing for sessions never rendered. Appears in: MA LBD indictment (Jun 2025), CT Minds Cornerstone indictment (Jan 2025), MN Smart Therapy guilty plea (Dec 2025)

**Scheme 2 — Credential laundering:** Unqualified staff delivering services billed under qualified credentials. Appears in: MN Smart Therapy, Star Autism Center (2025); CO OIG audit (1,500–2,000 untrained techs, Feb 2026)

**Scheme 3 — Kickbacks/recruitment:** Cash payments (\$300–\$1,500/month) to parents or referral sources for client enrollment. Appears in: MN Smart Therapy guilty plea; MN 85 open EIDBI investigations (2025)

**Scheme 4 — Group as individual:** Multiple clients in group session billed as individual 97153 treatment. Appears in: Indiana OIG audit (Dec 2024); Cotiviti FWA case studies; OIG findings across all 4 audited states

**Scheme 5 — Historical billing:** Claims based on schedule or prior authorization rather than actual services; meals/breaks included in billable time. Appears in: MA LBD indictment; Indiana and Wisconsin OIG audits

**Scheme 6 — Document falsification:** Forged signatures, fabricated session notes, altered records. Appears in: MN Smart Therapy (forged approvals); MA LBD (directed falsification); CT Minds Cornerstone; Cotiviti audit (altered psych reports)

**Scheme 7 — Inflated hours:** Services delivered but medically unnecessary or at intensity not supported by clinical need. Appears in: WSJ investigation (Piece by Piece, IN, \$340K/child/year); Indiana OIG (7 hrs/day, 5 days/week, age 8)

**Legal threshold:** Schemes 1–6 = criminal fraud potential (False Claims Act, wire fraud, 18 U.S.C. § 1001). Scheme 7 = civil False Claims or recoupment territory unless intent proven. All seven carry audit repayment risk.

**Detection tools that work:** Claims analytics (concurrent billing, holiday billing, NPI mismatches); session note auditing (templates, time reconciliation); intake monitoring (referral patterns, enrollment without diagnosis)

**Detection tools that don't reach:** Systematic document fabrication; kickbacks paid outside billing system; inflated hours with internally consistent clinical rationale. Requires

site visits, client contact, or whistleblower reports.

**Enforcement posture (2026):** 100% improper/potentially improper claims in all 4 OIG-audited states. Active DOJ prosecutions in MN, MA, CT. 85 MN EIDBI investigations. State MFCUs in 12+ states with ABA as priority enforcement area.

**Whistleblower note:** False Claims Act qui tam suits allow employees or insiders to file suit on behalf of the government and receive 15–30% of any federal recovery. RBTs and BCBAs are among the most likely whistleblowers in ABA fraud cases.

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## State of Nevada Applied Behavior Analysis Board

## Balance Sheet

As of March 31, 2026

	<u>Mar 31, 26</u>
<b>ASSETS</b>	
<b>Current Assets</b>	
Checking/Savings	
Heritage Bank	802,724.56
<b>Total Checking/Savings</b>	<u>802,724.56</u>
<b>Accounts Receivable</b>	
Accounts Receivable	5,688.93
<b>Total Accounts Receivable</b>	<u>5,688.93</u>
<b>Other Current Assets</b>	
Prepaid Expenses	9,057.82
<b>Total Other Current Assets</b>	<u>9,057.82</u>
<b>Total Current Assets</b>	<u>817,471.31</u>
<b>Fixed Assets</b>	
Accumulated Amortization	-12,067.00
SAAS Asset	26,328.00
<b>Total Fixed Assets</b>	<u>14,261.00</u>
<b>Other Assets</b>	
Deferred Outflows - OPEB	4,242.40
<b>Total Other Assets</b>	<u>4,242.40</u>
<b>TOTAL ASSETS</b>	<u><u>835,974.71</u></u>
<b>LIABILITIES &amp; EQUITY</b>	
<b>Liabilities</b>	
<b>Current Liabilities</b>	
Other Current Liabilities	
Deferred Revenue	240,530.22
Fines - due to State	4,500.00
Paid Time Off	7,867.02
Payroll Liabilities	8,734.57
SAAS Current Liability	13,701.00
<b>Total Other Current Liabilities</b>	<u>275,332.81</u>
<b>Total Current Liabilities</b>	<u>275,332.81</u>
<b>Long Term Liabilities</b>	
Deferred Inflows - OPEB	5,182.00
Net OPEB liability	62,693.00
<b>Total Long Term Liabilities</b>	<u>67,875.00</u>
<b>Total Liabilities</b>	<u>343,207.81</u>
<b>Equity</b>	
Opening Balance Equity	300,468.19
Retained Earnings	154,431.66
Net Income	37,867.05
<b>Total Equity</b>	<u>492,766.90</u>
<b>TOTAL LIABILITIES &amp; EQUITY</b>	<u><u>835,974.71</u></u>

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## State of Nevada Applied Behavior Analysis Board Profit & Loss Budget vs. Actual

04/06/26

March 2026

Accrual Basis

	Mar 26	Budget	\$ Over Budget	% of Budget
<b>Ordinary Income/Expense</b>				
<b>Income</b>				
Application Fee	2,450.00	1,416.67	1,033.33	172.9%
Exam Fees	1,500.00	2,083.33	-583.33	72.0%
License Fee	12,717.27	14,166.67	-1,449.40	89.8%
Other Fees	150.00	208.33	-58.33	72.0%
RBT Registration	7,839.99	14,166.67	-6,326.68	55.3%
<b>Total Income</b>	<b>24,657.26</b>	<b>32,041.67</b>	<b>-7,384.41</b>	<b>77.0%</b>
<b>Expense</b>				
Bank Service Charges	546.34	666.67	-120.33	82.0%
Board Compensation	2,700.00	1,000.00	1,700.00	270.0%
Computer and Internet Expenses	175.70	333.33	-157.63	52.7%
Dues and Memberships	250.00			
Insurance Expense	245.32	291.67	-46.35	84.1%
Licensing System	1,189.25	2,083.33	-894.08	57.1%
Office Supplies	65.91	166.67	-100.76	39.5%
Payroll Expenses				
Deferred Compensation	1,472.44	1,000.00	472.44	147.2%
Employer Taxes	1,672.40	1,250.00	422.40	133.8%
Hourly Wages	6,195.20	4,333.33	1,861.87	143.0%
Medical Benefits	2,296.70	2,083.33	213.37	110.2%
PTO Expense	1,764.41	500.00	1,264.41	352.9%
Salaries	13,030.43	8,333.33	4,697.10	156.4%
<b>Total Payroll Expenses</b>	<b>26,431.58</b>	<b>17,499.99</b>	<b>8,931.59</b>	<b>151.0%</b>
Postage	0.00	54.17	-54.17	0.0%
Professional Fees	1,613.44	3,083.33	-1,469.89	52.3%
Rent Expense	697.59	708.33	-10.74	98.5%
Repairs and Maintenance	0.00	41.67	-41.67	0.0%
Telephone Expense	74.44	41.67	32.77	178.6%
Training and Conferences	514.97	416.67	98.30	123.6%
Travel Expense	6,752.35	541.67	6,210.68	1,246.6%
<b>Total Expense</b>	<b>41,256.89</b>	<b>26,929.17</b>	<b>14,327.72</b>	<b>153.2%</b>
<b>Net Ordinary Income</b>	<b>-16,599.63</b>	<b>5,112.50</b>	<b>-21,712.13</b>	<b>-324.7%</b>
<b>Net Income</b>	<b>-16,599.63</b>	<b>5,112.50</b>	<b>-21,712.13</b>	<b>-324.7%</b>

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**State of Nevada Applied Behavior Analysis Board**  
**Profit & Loss Budget vs. Actual**  
**July 2025 through March 2026**

04/06/26

Accrual Basis

	Jul '25 - Mar 26	Budget	\$ Over Budget	% of Budget
<b>Ordinary Income/Expense</b>				
<b>Income</b>				
Application Fee	16,450.00	12,750.03	3,699.97	129.0%
Exam Fees	19,050.00	18,749.97	300.03	101.6%
License Fee	118,487.26	127,500.03	-9,012.77	92.9%
Other Fees	2,075.00	1,874.97	200.03	110.7%
RBT Registration	106,610.00	127,500.03	-20,890.03	83.6%
Reimbursements	5,260.84			
<b>Total Income</b>	<b>267,933.10</b>	<b>288,375.03</b>	<b>-20,441.93</b>	<b>92.9%</b>
<b>Expense</b>				
Bank Service Charges	5,678.24	6,000.03	-321.79	94.6%
Board Compensation	8,700.00	9,000.00	-300.00	96.7%
Computer and Internet Expenses	2,744.68	2,999.97	-255.29	91.5%
Dues and Memberships	694.50			
Insurance Expense	2,054.96	2,625.03	-570.07	78.3%
Licensing System	9,514.00	18,749.97	-9,235.97	50.7%
Office Supplies	1,022.42	1,500.03	-477.61	68.2%
Payroll Expenses				
Deferred Compensation	8,874.13	9,000.00	-125.87	98.6%
Employer Taxes	10,175.44	11,250.00	-1,074.56	90.4%
Hourly Wages	34,823.30	38,999.97	-4,176.67	89.3%
Medical Benefits	20,712.14	18,749.97	1,962.17	110.5%
PTO Expense	-1,226.59	4,500.00	-5,726.59	-27.3%
Salaries	78,531.59	74,999.97	3,531.62	104.7%
<b>Total Payroll Expenses</b>	<b>151,890.01</b>	<b>157,499.91</b>	<b>-5,609.90</b>	<b>96.4%</b>
Postage	298.67	487.53	-188.86	61.3%
Professional Fees	33,119.10	27,749.97	5,369.13	119.3%
Rent Expense	6,278.31	6,374.97	-96.66	98.5%
Repairs and Maintenance	0.00	375.03	-375.03	0.0%
Telephone Expense	617.91	375.03	242.88	164.8%
Training and Conferences	647.97	3,750.03	-3,102.06	17.3%
Travel Expense	6,805.28	4,875.03	1,930.25	139.6%
<b>Total Expense</b>	<b>230,066.05</b>	<b>242,362.53</b>	<b>-12,296.48</b>	<b>94.9%</b>
<b>Net Ordinary Income</b>	<b>37,867.05</b>	<b>46,012.50</b>	<b>-8,145.45</b>	<b>82.3%</b>
<b>Net Income</b>	<b>37,867.05</b>	<b>46,012.50</b>	<b>-8,145.45</b>	<b>82.3%</b>

State of Nevada Applied Behavior Analysis Board  
Transactions by Account  
As of March 31, 2026

Type	Date	Num	Name	Memo	Split	Amount
Heritage Bank						
Check	03/02/2026	1373	Dyshea T Upshaw	Service Charge	License Fee	-200.00
Check	03/03/2026			Created by Payroll Service on ...	Bank Service Charges	-106.86
Liability Check	03/05/2026		QuickBooks Payroll Service		-SPLIT-	-4,962.98
Check	03/05/2026	ACH	Federation of Associations		Dues and Memberships	-250.00
Check	03/05/2026	1375	Office of the Attorney General		Professional Fees	-426.02
Check	03/05/2026	1374	Numbers Inc.		Professional Fees	-387.42
Check	03/06/2026	ACH	Voya		Def Comp Liabilities	-460.14
Check	03/09/2026	1376	AT&T		Telephone Expense	-24.54
Check	03/10/2026	1377	Krystal Watkins	Refund overpayment	License Fee	-200.00
Check	03/11/2026		Constant Contact		Computer and Internet ...	-123.50
Check	03/11/2026		Edible		Office Supplies	-96.58
Check	03/15/2026		Emeril's Table	Travel meal	Travel Expense	-25.37
Check	03/16/2026		QuickBooks Payroll Service	Created by Direct Deposit Serv...	Bank Service Charges	-1,053.07
Check	03/16/2026	1378	Wendy Knorr	Hotel reimbursement	Travel Expense	-1,175
Check	03/16/2026		Evolve		Travel Expense	-31.36
Check	03/16/2026		Curb	Travel meal	Travel Expense	-43.20
Check	03/16/2026		Austin Airport	Travel meal	Travel Expense	-21.97
Check	03/17/2026		GP174 PEBP	Account #174	Medical Benefits	-2,466.14
Liability Check	03/19/2026	ACH	QuickBooks Payroll Service	Created by Payroll Service on ...	-SPLIT-	-4,962.95
Liability Check	03/20/2026		United States Treasury	86-3445270 QB Tracking # -15...	-SPLIT-	-2,917.30
Check	03/20/2026	E-pay	Voya		Def Comp Liabilities	-460.14
Check	03/23/2026	1379	Sena Moran	Refund overpayment	License Fee	-200.00
Check	03/23/2026	1380	AT&T		Telephone Expense	-46.46
Check	03/24/2026	1384	Brighid Fronapfel		Board Compensation	-450.00
Check	03/24/2026	1382	Janelle Saunders		Board Compensation	-750.00
Check	03/24/2026	1383	Christine Fuller		Board Compensation	-750.00
Check	03/24/2026	1381	Janelle Saunders		-SPLIT-	-2,113.60
Check	03/25/2026	Debit	Microsoft		Computer and Internet ...	-20.00
Check	03/25/2026	Debit	Microsoft		Computer and Internet ...	-32.20
Check	03/31/2026	1387	Stephanie Huff		Board Compensation	-750.00
Check	03/31/2026	1386	Stephanie Huff		-SPLIT-	-2,856.16
Bill Pmt -Check	03/31/2026		AT&T	QuickBooks generated zero a...	Accounts Payable	0.00
Total Heritage Bank						-27,189.71
<b>TOTAL</b>						<b>-27,189.71</b>

**State of Nevada Applied Behavior Analysis Board**  
**Balance Sheet**  
As of April 30, 2026

	Apr 30, 26
<b>ASSETS</b>	
<b>Current Assets</b>	
Checking/Savings	
Heritage Bank	789,472.59
<b>Total Checking/Savings</b>	789,472.59
Accounts Receivable	
Accounts Receivable	5,688.93
<b>Total Accounts Receivable</b>	5,688.93
<b>Other Current Assets</b>	
Prepaid Expenses	10,928.63
<b>Total Other Current Assets</b>	10,928.63
<b>Total Current Assets</b>	806,090.15
<b>Fixed Assets</b>	
Accumulated Amortization	-12,067.00
SAAS Asset	26,328.00
<b>Total Fixed Assets</b>	14,261.00
<b>Other Assets</b>	
Deferred Outflows - OPEB	4,242.40
<b>Total Other Assets</b>	4,242.40
<b>TOTAL ASSETS</b>	<b>824,593.55</b>
<b>LIABILITIES &amp; EQUITY</b>	
<b>Liabilities</b>	
<b>Current Liabilities</b>	
Other Current Liabilities	
Deferred Revenue	213,804.64
Fines - due to State	4,500.00
Paid Time Off	7,867.02
Payroll Liabilities	143.31
SAAS Current Liability	13,701.00
<b>Total Other Current Liabilities</b>	240,015.97
<b>Total Current Liabilities</b>	240,015.97
<b>Long Term Liabilities</b>	
Deferred Inflows - OPEB	5,182.00
Net OPEB liability	62,693.00
<b>Total Long Term Liabilities</b>	67,875.00
<b>Total Liabilities</b>	307,890.97
<b>Equity</b>	
Opening Balance Equity	300,468.19
Retained Earnings	154,431.66
Net Income	61,802.73
<b>Total Equity</b>	516,702.58
<b>TOTAL LIABILITIES &amp; EQUITY</b>	<b>824,593.55</b>

**State of Nevada Applied Behavior Analysis Board**  
**Profit & Loss Budget vs. Actual**  
**April 2026**

05/05/26

Accrual Basis

	Apr 26	Budget	\$ Over Budget	% of Budget
<b>Ordinary Income/Expense</b>				
<b>Income</b>				
Application Fee	1,900.00	1,416.67	483.33	134.1%
Exam Fees	0.00	2,083.33	-2,083.33	0.0%
License Fee	18,751.14	14,166.67	4,584.47	132.4%
Other Fees	175.00	208.33	-33.33	84.0%
RBT Registration	21,859.44	14,166.67	7,692.77	154.3%
<b>Total Income</b>	<b>42,685.58</b>	<b>32,041.67</b>	<b>10,643.91</b>	<b>133.2%</b>
<b>Expense</b>				
Bank Service Charges	587.67	666.67	-79.00	88.2%
Board Compensation	0.00	1,000.00	-1,000.00	0.0%
Computer and Internet Expenses	200.70	333.33	-132.63	60.2%
Dues and Memberships	260.00			
Insurance Expense	245.32	291.67	-46.35	84.1%
Licensing System	1,189.25	2,083.33	-894.08	57.1%
Office Supplies	468.00	166.67	301.33	280.8%
<b>Payroll Expenses</b>				
Deferred Compensation	368.12	1,000.00	-631.88	36.8%
Employer Taxes	562.88	1,250.00	-687.12	45.0%
Hourly Wages	1,476.20	4,333.33	-2,857.13	34.1%
Medical Benefits	2,309.85	2,083.33	226.52	110.9%
PTO Expense	0.00	500.00	-500.00	0.0%
Salaries	3,257.61	8,333.33	-5,075.72	39.1%
<b>Total Payroll Expenses</b>	<b>7,974.66</b>	<b>17,499.99</b>	<b>-9,525.33</b>	<b>45.6%</b>
Postage	168.25	54.17	114.08	310.6%
Professional Fees	6,883.82	3,083.33	3,800.49	223.3%
Rent Expense	697.59	708.33	-10.74	98.5%
Repairs and Maintenance	0.00	41.67	-41.67	0.0%
Telephone Expense	74.64	41.67	32.97	179.1%
Training and Conferences	0.00	416.67	-416.67	0.0%
Travel Expense	0.00	541.67	-541.67	0.0%
<b>Total Expense</b>	<b>18,749.90</b>	<b>26,929.17</b>	<b>-8,179.27</b>	<b>69.6%</b>
<b>Net Ordinary Income</b>	<b>23,935.68</b>	<b>5,112.50</b>	<b>18,823.18</b>	<b>468.2%</b>
<b>Net Income</b>	<b>23,935.68</b>	<b>5,112.50</b>	<b>18,823.18</b>	<b>468.2%</b>

6:18 PM

**State of Nevada Applied Behavior Analysis Board**  
**Profit & Loss Budget vs. Actual**  
**July 2025 through April 2026**

05/05/26

Accrual Basis

	Jul '25 - Apr 26	Budget	\$ Over Budget
<b>Ordinary Income/Expense</b>			
<b>Income</b>			
Application Fee	18,350.00	14,166.70	4,183.30
Exam Fees	19,050.00	20,833.30	-1,783.30
License Fee	137,238.40	141,666.70	-4,428.30
Other Fees	2,250.00	2,083.30	166.70
RBT Registration	128,469.44	141,666.70	-13,197.26
Reimbursements	5,260.84		
<b>Total Income</b>	<b>310,618.68</b>	<b>320,416.70</b>	<b>-9,798.02</b>
<b>Expense</b>			
Bank Service Charges	6,265.91	6,666.70	-400.79
Board Compensation	8,700.00	10,000.00	-1,300.00
Computer and Internet Expenses	2,945.38	3,333.30	-387.92
Dues and Memberships	954.50		
Insurance Expense	2,300.28	2,916.70	-616.42
Licensing System	10,703.25	20,833.30	-10,130.05
Office Supplies	1,490.42	1,666.70	-176.28
Payroll Expenses			
Deferred Compensation	9,242.25	10,000.00	-757.75
Employer Taxes	10,738.32	12,500.00	-1,761.68
Hourly Wages	36,299.50	43,333.30	-7,033.80
Medical Benefits	23,021.99	20,833.30	2,188.69
PTO Expense	-1,226.59	5,000.00	-6,226.59
Salaries	81,789.20	83,333.30	-1,544.10
<b>Total Payroll Expenses</b>	<b>159,864.67</b>	<b>174,999.90</b>	<b>-15,135.23</b>
Postage	466.92	541.70	-74.78
Professional Fees	40,002.92	30,833.30	9,169.62
Rent Expense	6,975.90	7,083.30	-107.40
Repairs and Maintenance	0.00	416.70	-416.70
Telephone Expense	692.55	416.70	275.85
Training and Conferences	647.97	4,166.70	-3,518.73
Travel Expense	6,805.28	5,416.70	1,388.58
<b>Total Expense</b>	<b>248,815.95</b>	<b>269,291.70</b>	<b>-20,475.75</b>
<b>Net Ordinary Income</b>	<b>61,802.73</b>	<b>51,125.00</b>	<b>10,677.73</b>
<b>Net Income</b>	<b>61,802.73</b>	<b>51,125.00</b>	<b>10,677.73</b>

6:18 PM

**State of Nevada Applied Behavior Analysis Board**  
**Profit & Loss Budget vs. Actual**  
July 2025 through April 2026

05/05/26

Accrual Basis

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	<u>% of Budget</u>
<b>Ordinary Income/Expense</b>	
<b>Income</b>	
Application Fee	129.5%
Exam Fees	91.4%
License Fee	96.9%
Other Fees	108.0%
RBT Registration	90.7%
Reimbursements	
<b>Total Income</b>	<u>96.9%</u>
<b>Expense</b>	
Bank Service Charges	94.0%
Board Compensation	87.0%
Computer and Internet Expenses	88.4%
Dues and Memberships	
Insurance Expense	78.9%
Licensing System	51.4%
Office Supplies	89.4%
Payroll Expenses	
Deferred Compensation	92.4%
Employer Taxes	85.9%
Hourly Wages	83.8%
Medical Benefits	110.5%
PTO Expense	-24.5%
Salaries	98.1%
<b>Total Payroll Expenses</b>	<u>91.4%</u>
Postage	86.2%
Professional Fees	129.7%
Rent Expense	98.5%
Repairs and Maintenance	0.0%
Telephone Expense	166.2%
Training and Conferences	15.6%
Travel Expense	125.6%
<b>Total Expense</b>	<u>92.4%</u>
<b>Net Ordinary Income</b>	<u>120.9%</u>
<b>Net Income</b>	<u><u>120.9%</u></u>

# State of Nevada Applied Behavior Analysis Board Transactions by Account As of April 30, 2026

Type	Date	Num	Name	Memo	Split	Amount
<b>Heritage Bank</b>						
Check	04/01/2026	1385	Numbers Inc.	Bookkeeping April - June	Professional Fees	-2,400.00
Liability Check	04/02/2026		QuickBooks Payroll Service	Created by Payroll Service on ...	-SPLIT-	-4,923.26
Check	04/02/2026	1388	Council on Licensure, Enfor...	FY27 Membership	Dues and Memberships	-260.00
Check	04/03/2026	ACH	Voya	Service Charge	Def Comp Liabilities	-460.14
Check	04/03/2026				Bank Service Charges	-91.29
Check	04/06/2026				-SPLIT-	-25.20
Check	04/06/2026	1389	Classmarker	Dec 25 legal fees - just received	Postage	-166.25
Check	04/07/2026	1390	Occupational Therapy Board		Professional Fees	-1,854.44
Check	04/07/2026		Office of the Attorney General		Telephone Expense	-28.20
Check	04/08/2026	1391	AT&T		Computer and Internet ...	-123.50
Check	04/10/2026		Constant Contact		Bank Service Charges	-1.75
Check	04/14/2026		QuickBooks Payroll Service	Created by Direct Deposit Serv...	-SPLIT-	-421.25
Liability Check	04/14/2026		Nevada Employment Securit...	86-3445270 QB Tracking # 25...	-SPLIT-	-2,898.24
Liability Check	04/14/2026	E-pay	United States Treasury	Account #174	Medical Benefits	-2,479.29
Check	04/15/2026	ACH	GP174 PEBP	Refund overpayment	License Fee	-50.00
Check	04/15/2026	1392	Candice Turner	Created by Payroll Service on ...	-SPLIT-	-4,943.60
Liability Check	04/16/2026		QuickBooks Payroll Service		Def Comp Liabilities	-460.14
Check	04/17/2026	ACH	Voya		Telephone Expense	-46.44
Check	04/22/2026	1393	AT&T		Computer and Internet ...	-20.00
Check	04/25/2026	Debit	Microsoft		Computer and Internet ...	-32.20
Check	04/25/2026	Debit	Microsoft		Office Supplies	-468.00
Check	04/27/2026		Survey Monkey	Jan 26 legal fees - just received	Professional Fees	-1,829.38
Check	04/29/2026	1394	Office of the Attorney General	Created by Payroll Service on ...	-SPLIT-	-4,812.97
Liability Check	04/30/2026		QuickBooks Payroll Service			
Total Heritage Bank						-28,797.54
<b>TOTAL</b>						<b>-28,797.54</b>

STATE OF NEVADA

JOE LOMBARDO  
Governor



DR. KRISTOPHER SANCHEZ  
Director

PERRY FAIGIN  
NIKKI HAAG  
MARCEL F. SCHAEERER  
Deputy Directors

DEPARTMENT OF BUSINESS AND INDUSTRY  
OFFICE OF THE DIRECTOR

**NOTICE OF INTENT TO ACT UPON A REGULATION**  
LCB File No. R074-25

**NOTICE OF HEARING AND AGENDA FOR THE ADOPTION OF PERMANENT  
REGULATIONS OF THE OFFICE OF NEVADA BOARDS, COMMISSIONS, AND  
COUNCILS STANDARDS**

The Office of Nevada Boards, Commissions, and Councils Standards (the Office) will hold a public hearing on Monday, May 11, 2026, commencing at 9:00 a.m. The public hearing will be video-conferenced between the two locations listed below.

**Department of Business and Industry  
Division of Insurance  
1818 College Parkway, Suite 103A  
Carson City, NV 89706  
And  
Department of Business and Industry  
2300 W. Sahara Avenue, Suite 750  
Las Vegas, NV 89102**

The purpose of the hearing is to receive comments from all interested persons regarding the adoption of regulations that pertain to Chapter 232 of the Nevada Administrative Code (NAC). The Office will receive testimony from all interested persons and consider and act on proposed permanent adoption of amendments, additions, and deletions to Chapter 232 of NAC as identified in LCB File No. R074-25. If no person who is directly affected by the proposed action appears to request time to make an oral presentation, the Office may proceed immediately to act upon any written submissions.

**1. The Need for and Purpose of the Proposed Permanent Regulations.**

The need and purpose of the proposed permanent regulations identified in LCB File No. R074-25

- a. Define certain terms relating to the administrative oversight of professional and occupational licensing board. (See sections 3-10 of R074-25 attached hereto.)

- b. Setting forth standards for each board including standards for record keeping and attendance at board meetings. (See section 11 of R074-25 attached hereto.)
- c. Establishing certain standards relating to the training of board members (See section 12 of R074-25 attached hereto.)
- d. Establishing certain standards for the internal controls of a board. (See section 13 of R074-25 attached hereto.)
- e. Establishing certain standards for the internet website of a board. (See section 14 of R074-25 attached hereto.)
- f. Establishing certain standards for a board relating to tracking certain bills during a legislative session. (See sections 15 of R074-25 attached hereto.)
- g. Creating standards for a board's transparency to the public including the publication of certain information to the public. (See section 16 of R074-25 attached hereto.)
- h. Setting forth certain standards relating to complaints and investigations by or on behalf of a board. (See section 17 of R074-25 attached hereto.)
- i. Creating standards for a board to provide certain information to the Office. (See section 18 of R074-25 attached hereto.)
- j. Providing certain standards of a board regarding finances and financial reporting. (See section 19 of R074-25 attached hereto.)
- k. Providing for the Office to issue certain recommendations relating to a board. (See section 20 of R074-25 attached hereto.)
- l. Providing other matters properly relating thereto. (See section 21 of R074-25 attached hereto.)

**2. Terms or Substance of the Proposed Permanent Regulations or Description of the Subjects and Issues Involved.**

- a. **Sections 2 through 10** of this regulation define key terms relating to professional and occupational licensing boards, including, without limitation, "board," "board member," "disciplinary action," "executive director," "license," "licensee," and the "Office."
- b. **Section 11** establishes structural standards for boards, including requirements to maintain centralized records of board membership and terms, procedures for electing or appointing officers, and attendance requirements for board members, including provisions related to unexcused absences and potential referral for removal.
- c. **Section 12** establishes standards and requirements for executive directors to notify board members of required training and mandates that boards report completion of such training to the Office.

- d. **Section 13** establishes uniform standards for internal controls, including requirements related to budgeting, recordkeeping, protection of confidential information, compliance with statutory reporting and auditing requirements, and corrective action in response to audit findings.
- e. **Section 14** establishes standards and requirements for each board to maintain a publicly accessible Internet website and specifies the information that must be made available to the public, including meeting materials, licensing information, disciplinary history, financial reports, and instructions for filing complaints.
- f. **Sections 15** establishes standards and requirements boards to track legislation during each legislative session, report on the impact of such legislation, and take necessary steps to implement enacted laws.
- g. **Section 16** Pertains to a board's publication of informational materials, including newsletters, alerts, or bulletins, to provide outreach and education to the public.
- h. **Section 17** establishes standards and requirements relating to complaints and investigations, including jurisdictional review, documentation of investigative timelines, and compliance with confidentiality requirements, and authorizes the Office to request information to the extent permitted by law.
- i. **Section 18** establishes standards and requirements for each board to submit quarterly reports to the Office, including information required under NRS 622.100, summaries of complaints and investigations, and other operational information related to board activities.
- j. **Section 19** establishes standards and requirements for boards to submit annual and quarterly financial information to the Office, including balance sheets or audit reports required under NRS 218G.400 and summary financial updates.
- k. **Section 20** requires the Office to conduct performance evaluations of boards using submitted reports and other information to assess administrative efficiency, internal controls, transparency, and compliance with statutory requirements.
- l. **Section 21** Concerns the Office's issuance of written recommendations to boards to address identified concerns and, where appropriate, refer potential malfeasance or nonfeasance of a board member to the Governor for consideration of removal.

### **3. How to Obtain the Approved or Revised Text of the Proposed Regulation Prepared by the Legislative Counsel.**

The text of the proposed regulations may be obtained online by visiting the State of Nevada Register of Administrative Regulations at:

<https://www.leg.state.nv.us/Register/2025Register/R074-25RP3.pdf>

The additional proposed amendments to LCB File No. R074-25 can be found in the document

attached hereto dated February 23, 2026.

**4. Estimated Economic Effect of the Proposed Permanent Regulations on the Businesses which they will Regulate, and the Public.**

**a. Adverse and Beneficial Effects**

The proposed permanent regulation presents no reasonably foreseeable or anticipated adverse economic effects to any small businesses. The regulations are administrative in nature and apply solely to the internal governance, reporting, and operational standards of occupational and licensing boards established under NRS 232.8415(1) (a-g) and (2) (a-kk). These boards are public bodies, not private business entities. Accordingly, the proposed regulations do not impose any direct or indirect requirements, fees, or compliance obligations on small businesses.

**b. Immediate and Long-Term Effects**

There are no anticipated immediate or long-term economic effects.

**5. The Methods Used by the Agency in Determining the Impact on a Small Business.**

The proposed amendments presented in LCB File No. R074-25 have no impact on small businesses, no methods to reduce such an impact were considered or used.

**6. Estimated Cost to Agency for Enforcement of the Proposed Permanent Regulation.**

The Office does not anticipate any additional enforcement costs. The regulations codify existing administrative and oversight practices and do not require new enforcement mechanisms.

**7. Regulations of Other State or Local Governmental Agencies which the Proposed Permanent Regulation Overlaps or Duplicates and their Necessity.**

The proposed regulation may overlap with certain existing statutory and regulatory requirements applicable to professional and occupational licensing boards, including, without limitation, requirements related to financial reporting, auditing, public meetings, and records management.

Such overlap includes, but is not limited to, statutory auditing and reporting requirements under NRS 218G.400 and NRS 622.100, as well as existing requirements governing public records (chapter 239 of NRS), open meeting law (chapter 241 of NRS), and other board-specific statutes and regulations.

This overlap is necessary to implement and operationalize the duties of the Office of Nevada Boards, Commissions and Councils Standards pursuant to NRS 232.8413 and 232.8415. The regulation does not create duplicative substantive requirements, but instead establishes uniform

administrative standards, reporting mechanisms, and processes to ensure consistent compliance, transparency, and accountability across all boards under the Office's purview.

To the extent any overlap exists, the regulation is intended to align with and support existing statutory requirements, not to conflict with or supersede them. The provisions of this regulation are applied in a manner consistent with all applicable statutes, and nothing in this regulation is intended to expand or limit the authority of any board beyond what is provided by statute.

**8. If the Regulation is Required pursuant to Federal Law, a Citation and Description of the Federal Law.**

The proposed permanent regulation is not required pursuant to federal law.

**9. If the Regulation includes Provisions which are More Stringent than a Federal Regulation that Regulates the Same Activity, a Summary of Such Provisions.**

The proposed permanent regulation does not include provisions which are more stringent than a federal regulation.

**10. Establishment of New Fees or Existing Fee Increases**

The proposed permanent regulation does not establish new fees or increase existing fees.

Persons wishing to comment on the proposed action of the Office may appear at the above-scheduled public hearing or may address their comments, data, views, or arguments, in written form, to the Office. **Written submissions must be received by the Office on or before May 4, 2026.**

A copy of this notice and the regulation to be adopted, will be deposited with the State Library, Archives and Public Records Administrator. Additional copies of the notice and the regulation to be adopted and the additional language changes will be available at the Department of Business and Industry locations at 2300 W. Sahara Avenue, Suite 770 Las Vegas, NV 89102, 1830 E. College Parkway, Suite 200, Carson City, NV 89706, and on the Office's website, <https://www.business.nv.gov/boards-and-commissions/>. This notice and the text of the proposed regulation are also available in the State of Nevada Register of Administrative Regulations, which is prepared and published monthly by the Legislative Counsel Bureau pursuant to NRS 233B.0653, and on the Internet at <http://www.leg.state.nv.us>. Copies of this notice and the proposed regulation will also be mailed to members of the public upon request. A reasonable fee may be charged for copies if it is deemed necessary.

Pursuant to NRS 233B.064(2), upon adoption of any regulation, the Office, if requested to do so by an interested person, either before adoption or within 30 days thereafter, will 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.

Note: We are pleased to make reasonable accommodations for members of the public who are disabled and wish to attend the meeting. If special arrangements are necessary, please email [bccsinfo@business.nv.gov](mailto:bccsinfo@business.nv.gov), or notify 775-684-2999 as soon as possible.



Nikki Haag  
Deputy Director, The Office of Nevada Boards, Commissions, and Councils Standards  
Friday, April 10, 2026

## NOTICE OF PUBLIC HEARING AND AGENDA

A authorized meeting of the Office of Nevada Boards, Commissions, and Councils Standards (the Office) will be held on **May 11, 2026**, at **9:00 a.m.** The public hearing will be video-conferenced between the two locations listed below:

**Department of Business and Industry  
Division of Insurance 1818 College Parkway  
Suite 103A, Carson City, NV 89706**

**And**

**Department of Business and Industry  
2300 W. Sahara Avenue, Suite 750  
Las Vegas, NV 89102**

### **Public Hearing Agenda:**

- A. OPEN PUBLIC HEARING**
- B. PUBLIC COMMENT**
- C. PRESENTATION OF PROPOSED REGULATIONS** Public hearing to discuss and adopt proposed amendments to the language of the permanent regulation identified as **LCB File No. R074-25**, *for possible action*.
- D. PUBLIC COMMENT**
- E. ADJOURNMENT**

**NOTE:** Any agenda item may be taken out of order; items may be combined for consideration; items may be pulled or removed from the agenda at any time; and discussion relating to an item may be delayed or continued at any time. The workshop presenter will indicate when live public comment will be taken and, within his/her discretion, may allow for public comment on individual agenda items.

**PUBLIC COMMENT:** Public comment is welcomed during public comment periods and is limited to 3 minutes per person per public comment period. Unused time may not be allocated to other speakers. A speaker's viewpoint will not be restricted; however, reasonable restrictions may be imposed upon the time, place, and manner of speech. Irrelevant statements, unduly repetitious statements, and personal attacks that would objectively antagonize or incite others are examples of speech that may be reasonably limited.

**WRITTEN COMMENT PROCEDURE:** Members of the public who wish to participate may do so by providing written public comment to the following email address: [BCCSinfo@business.nv.gov](mailto:BCCSinfo@business.nv.gov). For inclusion or reference in the record of this workshop, please include your full name and contact information. Written submissions must be received by the Department on or before May 4, 2026. The Department may place other reasonable restrictions on the time, place, and manner of public comments but may not restrict comments based upon viewpoint.

**DISABILITY ACCOMODATIONS:** We are pleased to make reasonable accommodations for members of the public with a disability and wish to participate. The Division will make reasonable accommodations for attendees with disabilities. Please notify the Division of your request for reasonable accommodation in writing no later than five (5) working days before the workshop via email to [BCCSinfo@business.nv.gov](mailto:BCCSinfo@business.nv.gov) in writing, at Department of Business and Industry 1830 E. College Pkwy, Suite 200 Carson City, NV 89706.

A copy of all materials relating to the proposal may be obtained by visiting the Division's website at: <https://www.business.nv.gov/> or by contacting the Division, 1830 E. College Pkwy, Suite 200, Carson City, NV 89706, (775) 684-2999. Members of the public who would like additional information about the proposed regulations may contact Nikki Haag, Deputy Director, at (775) 684-2999, or via e-mail to [Nikki.Haag@business.nv.gov](mailto:Nikki.Haag@business.nv.gov).

**NOTICE OF THE HEARING AND AGENDA HAS BEEN PROVIDED AS FOLLOWS:**

1. Posted at the Division's principal office/in-person physical locations: 2300 W. Sahara, Ave., Suite. 770, Las Vegas, Nevada 89102, and 1830 College Pkwy, Suite 200, Carson City, NV 89706
2. Posted online to the Nevada Legislature website: <http://leg.state.nv.us/App/Notice/A/>
3. Posted online to the State of Nevada Public Notice website: <https://notice.nv.gov>
4. Posted online to the Division's website: <https://www.business.nv.gov/about/meetings-and-agendas/2026-meetings-and-agendas/>
5. By email to all persons on the Office of Nevada Boards, Commissions, and Councils Standards listserv
6. By email to all Executive Director's or equivalent officer under NRS 232.8415 (2) (a-kk)

**THIRD REVISED PROPOSED REGULATION OF THE  
DIRECTOR OF THE DEPARTMENT OF BUSINESS AND  
INDUSTRY**

**LCB File No. R074-25**

February 23, 2026

EXPLANATION – Matter in *italics* is new; matter in brackets [~~omitted material~~] is material to be omitted.

AUTHORITY: §§ 1-21, NRS 232.8413.

A REGULATION relating to professional and occupational licensing boards; defining certain terms relating to the regulation of professional and occupational licensing boards; setting forth certain standards for each board relating to recordkeeping, officers of the board and attendance at board meetings; establishing certain requirements relating to the training of board members; establishing certain standards for the internal controls of a board; establishing certain requirements for the Internet website of a board; establishing certain requirements for a board relating to certain bills during a legislative session; authorizing a board to publish certain information for the public; setting forth certain standards relating to complaints to and investigations by or on behalf of a board; requiring a board to provide certain information to the Office of Nevada Boards, Commissions and Councils Standards within the Department of Business and Industry; providing for the Office to conduct performance evaluations of a board; providing for the Office to issue certain recommendations relating to a board; and providing other matters properly relating thereto.

**Legislative Counsel's Digest:**

Existing law creates the Office of Nevada Boards, Commissions and Councils Standards within the Department of Business and Industry and charges the Office with certain duties relating to the regulation of professional and occupational licensing boards, including: (1) centralized administration; (2) establishing a uniform set of standards for investigations, licensing and discipline, internal controls and legal representation; (3) establishing a consistent set of structural standards for boards and commissions; (4) transparency and consumer protection; and (5) efficacy and efficiency. Existing law requires the Director of the Department to adopt regulations and procedures to administer the responsibilities of the Office. (NRS 232.8413, 232.8415) **Sections 3-10** of this regulation define certain terms relating to the regulation of professional and occupational licensing boards. **Section 2** of this regulation applies these definitions to the provisions of this regulation.

**Section 11** of this regulation establishes certain structural standards for each board to: (1) maintain certain centralized records relating to each seat on the board, the board members filling

those seats, and the terms of the board members serving on the board; and (2) elect or appoint officers of the board. **Section 11** also sets forth certain attendance requirements for board members at meetings.

**Section 12** of this regulation requires: (1) the executive director of each board to notify board members of certain training requirements and when such training is offered; and (2) the board to notify the Office that a board member has successfully completed such training.

**Section 13** of this regulation requires each board to establish certain standards for internal controls including: (1) developing and implementing a budget; (2) maintaining and protecting information in the records of the board in a certain manner; (3) complying and cooperating with all statutory and regulatory reporting and auditing requirements; and (4) taking certain actions to respond to audits that recommend corrective action.

**Section 14** of this regulation requires each board to maintain a publicly accessible Internet website of the board, which includes certain information and meets certain requirements.

**Section 15** of this regulation requires each board to: (1) track bills during a regular or special legislative session which may impact the operations of or licensees regulated by the board; (2) report certain information to the Office relating to such bills; and (3) take certain steps to implement bills which became law.

**Section 16** of this regulation authorizes a board to publish certain materials to inform the public of information relating to the board and licensees of the board.

**Section 17** of this regulation sets forth certain requirements relating to complaints to and investigations conducted by or on behalf of a board. **Section 18** of this regulation requires a board to provide certain quarterly information to the Office relating to complaints, investigations, disciplinary actions, licensees and other board operations.

**Section 19** of this regulation requires a board to submit certain financial information to the Office on a quarterly and annual basis.

**Section 20** of this regulation requires the Office to evaluate the performance of each board using the reports and other information required to be submitted to the Office.

**Section 21** of this regulation provides that if the Office identifies: (1) certain concerns with a board, the Office may provide the board with written recommendations to address such concerns; or (2) certain conduct of a board member that may constitute malfeasance or nonfeasance, the Office may refer the board member to the Governor for possible removal.

**Section 1.** Chapter 232 of NAC is hereby amended by adding thereto the provisions set forth as sections 2 to 21, inclusive, of this regulation.

**Sec. 2.** *As used in sections 2 to 21, inclusive, of this regulation, unless the context otherwise requires, the words and terms defined in sections 3 to 10, inclusive, of this regulation have the meanings ascribed to them in those sections.*

**Sec. 3. "Board" means any professional or occupational licensing body, including, without limitation, a board, commission or council, that has been created by the Legislature and which is under the purview of the Office.**

**Sec. 4. "Board member" means a person appointed to serve on a board.**

**Sec. 5. "Disciplinary action" means any final action taken by a board against a licensee, including, without limitation, a public reprimand, probation, a fine, the suspension or revocation of a license or the voluntary surrender of a license in lieu of discipline.**

**Sec. 6. "Executive director" means a person appointed or employed by a board to oversee the daily operations of the board.**

**Sec. 7. "License" means any professional or occupational authorization, including, without limitation, a license, permit, registration or certificate, that is issued by a board.**

**Sec. 8. "Licensee" means any person who holds a license issued by a board.**

**Sec. 9. "Office" means the Office of Nevada Boards, Commissions and Councils Standards within the Department.**

**Sec. 10. "Purview" means administrative oversight.**

**Sec. 11. 1. For the purposes of establishing a consistent set of structural standards pursuant to NRS 232.8415:**

**(a) Each board shall:**

**(I) Maintain a centralized record of:**

**(I) Each seat on the board, including, without limitation, whether the seat is required by statute to represent certain interests or to serve a certain role;**

**(II) Each board member who is filling a seat on the board; and**

***(III) The terms of each board member, including, without limitation, the date on which each term begins and expires.***

***(2) Elect or appoint the officers of the board in accordance with the applicable statutes and regulations governing the board. Except as otherwise provided by specific statute or regulation adopted by the board, the board shall elect the officers of the board on an annual basis.***

***(b) Board members are required to attend and participate in meetings of the board. If, within a 12-month period, a board member has three or more consecutive unexcused absences or has unexcused absences from 50 percent or more of the meetings of the board, the board member has failed to meet this attendance requirement and the board or the Office may submit a recommendation to the Governor for the removal of the board member pursuant to NRS 232A.030.***

***2. As used in this section, "unexcused absence" means an absence that is not:***

***(a) Caused by illness, family emergency or other extenuating circumstance;***

***(b) Approved by the chair of the board; or***

***(c) Otherwise authorized by statute.***

***Sec. 12. 1. The executive director of each board shall notify the board members of any training that the board members are required to complete pursuant to NRS 622.200 and when such training will be offered.***

***2. Not more than 30 days after a board member successfully completes any training required pursuant to NRS 622.200, the board shall provide written notice to the Office, in a format prescribed by the Office, confirming that the board member has successfully completed the required training.***

**Sec. 13. For the purpose of establishing a uniform set of standards for internal controls pursuant to NRS 232.8415, each board shall:**

**1. Develop a budget for the board and monitor the implementation of the budget.**

**2. Maintain any information in the records of the board relating to licensees, finances and complaints in a manner that ensures the information is accurate, complete and verifiable.**

**3. Protect the confidential and personally identifiable information in the records of the board.**

**4. Comply and cooperate with all reporting and auditing requirements:**

**(a) Set forth by any applicable statute or regulation, including, without limitation, the governing statutes of the board and the requirements of title 54 of NRS or NRS 218G.400, 331.110, 333.705, as amended by section 8 of Assembly Bill No. 506, chapter 153, Statutes of Nevada 2025, at page 859, or NRS 622.100, as amended by section 3 of Senate Bill No. 274, chapter 83, Statutes of Nevada 2025, at page 444; or**

**(b) Established by any state entity authorized to conduct audits or require reports pursuant to any applicable statute or regulation, including, without limitation, the Legislative Auditor or the Budget Division of the Office of Finance,**

**↪ in a timely and accurate manner and in accordance with any deadline set forth in statute or regulation or established by the applicable state entity.**

**5. Respond to all audits of the board that are required or authorized by statute or conducted by a state entity that is authorized to conduct audits of the board pursuant to statute. Except as otherwise provided by specific statute, each board shall, not more than 90 days after receiving a final written report of an audit that recommends corrective action:**

*(a) Prepare a written plan for corrective action that addresses all recommendations for the corrective action; and*

*(b) Submit evidence to the auditing entity that the corrective action set forth in the written plan prepared pursuant to paragraph (a) has been taken.*

**Sec. 14. 1. Each board shall maintain a publicly accessible Internet website of the board which is accessible to persons with disabilities, including, without limitation, persons who are blind or visually impaired and, in addition to any other information required by statute or regulation of the board, post on the Internet website of the board:**

*(a) A citation and link to the enabling statutes of the board and any regulations adopted by the board, including, without limitation, emergency regulations, temporary regulations and permanent regulations of the board which have been adopted and filed with the Secretary of State pursuant to chapter 233B of NRS but not yet codified in the Nevada Administrative Code.*

*(b) The mission statement of the board.*

*(c) For all current board members:*

*(1) The name of each board member;*

*(2) If the board member was appointed to represent certain interests or serve a certain role that is required by statute, the interests or role which the board member represents or serves; and*

*(3) The dates on which the term of each board member begins and expires.*

*(d) The name and title of the executive director of the board.*

*(e) The contact information for the board, including, without limitation, the electronic mailing address, mailing address, physical address and telephone number for the board.*

***(f) Any upcoming meeting of the board or a subcommittee of the board, which must include, without limitation, the date, time, location, agenda, when available, and any other information required for notice of an upcoming meeting pursuant to NRS 241.020 or 622.340, as applicable.***

***(g) An archive consisting of all agendas and minutes of meetings of the board prepared pursuant to NRS 241.035 for a period of not less than the immediately preceding 5 years. All other agendas and minutes of meetings of the board outside of such 5-year period must be made available upon request in accordance with the provisions of chapter 239 of NRS.***

***(h) Clear instructions for applying for initial licensure, renewing a license and the reinstatement of a license and any applicable deadlines set forth in statute or regulation for applying for, renewing or reinstating a license.***

***(i) A system for verifying licenses, which must be accessible from the homepage of the Internet website with one click and, for each licensee, must include, without limitation, the full name of the licensee, the type and status of the license, the license number, the date of issuance and the date of expiration of the license and a yes-or-no-indication of whether the licensee has any history of disciplinary actions.***

***(j) A system for reviewing the history of disciplinary actions of a licensee, which must:***

***(1) Be accessible from the homepage of the Internet website;***

***(2) Be searchable;***

***(3) Be updated not more than 15 days after any new disciplinary action is finalized;***

***(4) Include, without limitation, the full name of the licensee, the type and status of the license, the license number of the licensee, the type of disciplinary action and the date of the disciplinary action; and***

***(5) Unless otherwise declared confidential by statute or court order, provide access to the final order or settlement agreement for any disciplinary action issued in the immediately preceding 5 years. All other final orders or settlement agreements for any disciplinary action not otherwise declared confidential outside of the immediately preceding 5-year period must be made available upon request in accordance with the provisions of chapter 239 of NRS.***

***(k) Clear instructions on how to file a complaint with the board, accompanied by forms that may be downloaded for filing a complaint or an online system on the Internet website that enables a person to file a complaint electronically.***

***(l) A copy of the most recent quarterly update submitted to the Office pursuant to section 19 of this regulation and a copy of all financial audits or balance sheets filed pursuant to NRS 218G.400 within the immediately preceding 5 years.***

***(m) A copy of any review, evaluation, report or audit of the board conducted or prepared within the immediately preceding 5 years by or on behalf of:***

***(1) The Sunset Committee of the Legislature;***

***(2) The Division of Internal Audits of the Office of Finance;***

***(3) The Fiscal Analysis Division of the Legislative Counsel Bureau; or***

***(4) Any other entity authorized by statute to conduct or prepare a review, evaluation report or audit of the board.***

***(n) A link to the Internet website of the Office which must be accessible from the homepage of the Internet website of the board.***

***(o) Any other report required to be published by statute or submitted annually by the board.***

***(p) Any performance data prepared by the board.***

**2. The Internet website of each board must comply with any applicable regulations, policies, standards and guidelines adopted by the Chief Information Officer of the Governor's Technology Office within the Office of the Governor pursuant to NRS 242.111, as amended by section 19 of Senate Bill No. 467, chapter 513, Statutes of Nevada 2025, at page 3565, and section 15 of Assembly Bill No. 1, chapter 4, Statutes of Nevada 2025, 36th Special Session, at page 42, and NRS 242.115.**

**3. As used in this section:**

**(a) "Emergency regulation" has the meaning ascribed to it in NRS 233B.033.**

**(b) "Performance data" means information or metrics prepared by a board to measure or report on the operations, workload or compliance with the statutory duties of the board, including, without limitation, data or metrics prepared by the board during the ordinary course of business or that is required by statute or regulation.**

**(c) "Permanent regulation" has the meaning ascribed to it in NRS 233B.036.**

**(d) "Temporary regulation" has the meaning ascribed to it in NRS 233B.0385.**

**Sec. 15. 1. During each regular or special legislative session, each board shall track any bills introduced in the Legislature which may impact the operations of or licensees regulated by the board.**

**2. Not later than 60 days after the adjournment of each regular or special legislative session, each board shall submit a report to the Office, in a format prescribed by the Office, identifying, for each bill tracked pursuant to subsection 1:**

**(a) The bills tracked by the board and whether the bills became law;**

**(b) The potential impact of each bill on the operations of or licensees regulated by the board;**

*(c) Any actions required by the board to implement any bills which became law during the legislative session; and*

*(d) The estimated timeline for the board to implement any bills which became law during the legislative session.*

*3. For any bill tracked by the board pursuant to subsection 1 for which a board is required to take action to implement, the board shall:*

*(a) Update the regulations of the board consistent with the bill;*

*(b) Ensure that the bank accounts and the records of the board are consistent with the requirements of the bill; and*

*(c) Notify the Office, in a format prescribed by the Office, once the board has implemented the bill.*

*Sec. 16. To provide outreach and education to the public, each board may publish newsletters, alerts or bulletins to inform the public of the activities of the board, professional standards of and ethical requirements for the licensees regulated by the board, the rights of the public and the procedures for reporting the misconduct of a licensee to the board.*

*Sec. 17. 1. To ensure transparency and access to the public, each board shall make available to any person who wishes to file a complaint with the board a form for filing the complaint or a method to file the complaint electronically.*

*2. When responding to a complaint filed with a board, the board shall comply with all requirements for confidentiality.*

*3. Before initiating an investigation, a board shall determine whether a complaint falls within the jurisdiction of the board.*

**4. For any matter under an investigation conducted by or on behalf of a board, the file of the complaint documenting the investigation must include, without limitation:**

**(a) Any statutory or regulatory deadlines applicable to the investigation and resolution of the complaint by the board;**

**(b) Whether the board met all the deadlines identified pursuant to paragraph (a); and**

**(c) If the board did not meet a deadline identified pursuant to paragraph (a), the reason the board did not meet the deadline.**

**5. For the purposes of subsection 4, the steps of an investigation may include, without limitation, the receipt or acknowledgment of a complaint, the issuance of a notice to a licensee, the determination of reasonable doubt, the filing of a formal complaint, the scheduling of a hearing and the issuance of a final decision by the board.**

**6. Upon the request of the Office and to the extent permitted by law, a board shall provide to the Office any files, documents, data or other information relating to an investigation conducted by the board, including, without limitation, any disciplinary action instituted as a result of an investigation.**

**Sec. 18. On or before the 20th day of January, April, July and October, each board shall submit to the Office, in a format prescribed by the Office:**

**1. All information required to be submitted to the Director of the Legislative Counsel Bureau pursuant to NRS 622.100, as amended by section 3 of Senate Bill No. 274, chapter 83, Statutes of Nevada 2025, at page 444. A board may submit a copy of the report submitted to the Director of the Legislative Counsel Bureau pursuant to NRS 622.100, as amended by section 3 of Senate Bill No. 274, chapter 83, Statutes of Nevada 2025, at page 444, to satisfy this requirement.**

**2. A summary of all complaints filed with the board during the immediately preceding calendar quarter, which must include, without limitation:**

**(a) All complaints received, pending and resolved by the board for the calendar quarter; and**

**(b) The number of complaints resolved by the board at each stage of the process for resolving a complaint, consistent with the statutory procedures of the board.**

**3. Any other information requested by the Office that is reasonably related to the administrative, fiscal or investigative operations of the board.**

**Sec. 19. 1. All money in the possession of a board must be deposited and used in accordance with any applicable statutes governing the board.**

**2. On or before December 1 of each year, each board shall submit to the Office:**

**(a) A copy of the balance sheet or the report of an audit, as applicable, required to be filed with the Legislative Auditor and the Chief of the Budget Division of the Office of Finance pursuant to NRS 218G.400; and**

**(b) A form, in the format prescribed by the Office, summarizing the information provided pursuant to paragraph (a), which must include, without limitation:**

**(1) The total revenue of the fiscal year;**

**(2) The total expenditures of the board at the end of the fiscal year;**

**(3) The cash balances of the board at the end of the fiscal year;**

**(4) A statement from the board identifying any significant financial or structural concerns identified by the board; and**

**(5) A review of the adequacy of the existing fees which the board is authorized to charge under statute.**

**3. Not later than 30 days after the close of each fiscal quarter, each board shall submit to the Office a quarterly update summarizing the finances of the board for that fiscal quarter, in a format prescribed by the Office, which must include, without limitation:**

**(a) The total revenue of the board at the end of the fiscal quarter;**

**(b) The total expenditures of the board at the end of the fiscal quarter; and**

**(c) The cash balances of the board at the end of the fiscal quarter.**

**Sec. 20. 1. The Office shall evaluate the performance of each board using the reports and information submitted to the Office pursuant to sections 2 to 21, inclusive, of this regulation to assess the administrative efficiency, internal controls, transparency, responsiveness to the public and compliance with statutory reporting requirements of a board.**

**2. If the Office identifies any issues during a performance evaluation conducted pursuant to subsection 1, the Office shall notify the board in writing and the board shall have 60 days to submit a written response addressing the issues identified by the Office. The Office shall evaluate the written response of the board, if any, before completing the performance evaluation of the board. The Office is not required to modify its findings or conclusions based on the written response of the board.**

**3. After completing a performance evaluation conducted pursuant to subsection 1, the Office may issue written recommendations to a board pursuant to section 21 of this regulation.**

**4. Nothing in this section shall be construed to authorize the Office to direct the financial or operational activities of a board or to require a board to take corrective action beyond what is required by statute.**

**Sec. 21. 1. If the Office identifies concerns regarding the compliance of a board with the requirements of statute or with the administrative practices, internal controls or reporting**

*compliance of the board, the Office shall provide the board with written recommendations to promote improved performance, administrative consistency or compliance with statutory and regulatory requirements.*

*2. Not more than 60 days after receiving written recommendations provided pursuant to subsection 1, a board shall review such recommendations and provide the Office with a written response describing the actions the board intends to take to address the written recommendations of the Office, if any.*

*3. If the Office identifies any conduct by a board member in the performance of his or her duties that may constitute malfeasance or nonfeasance, including, without limitation, neglect of duty, incompetence or inefficiency, the Office may refer such conduct to the Governor to consider whether the board member should be removed from the board pursuant to NRS 232A.030.*

## **Public Workshop Minutes**

### **Office of Nevada Boards, Commissions, and Councils Standards Workshop on Proposed Regulation R074-25**

**Date:** March 31, 2026

**Time:** 10:00 AM

**Location:** Hybrid 2300 W. Sahara Ave., Suite 750 Las Vegas, NV 89102 (In-person and virtual via Teams)

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#### **1. Call to Order**

The public workshop was called to order by **Nikki Haag**.

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#### **2. Opening Remarks**

Ms. Haag provided an overview of the purpose of the workshop, including:

- Implementation of responsibilities under **NRS 232.8413 and NRS 232.8415**
  - Development of uniform standards for:
    - Licensing, investigations, and discipline
    - Internal controls
    - Governance and structure
    - Transparency and consumer protection
    - Efficiency and effectiveness
- 

#### **3. Public Comment – Initial**

- Virtual participants indicated they were unable to hear initial public comment due to audio issues.
- Individuals who provided earlier comment were invited to restate their remarks.

#### **Key Initial Comment Themes:**

- Concern regarding open-ended reporting requirements (“format prescribed by the Office”) and associated cost uncertainty

- Potential need for additional staffing or consultants to meet reporting requirements
  - Concern that defining terms such as “purview” may be more appropriate at the statutory level
- 

#### **4. Review of Proposed Regulation (Sections 2–21)**

The Office reviewed the regulation section-by-section and paused for public comment after each section.

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##### **Section 10 – Definitions**

###### **Comments:**

- “Purview” (defined as administrative oversight) viewed as broad and potentially ambiguous
  - Recommendation for clearer or more detailed definition
- 

##### **Section 11 – Board Structure & Attendance**

###### **Comments:**

- Concern that attendance requirements may conflict with existing NRS provisions for specific boards
  - Recommendation to ensure regulations do not exceed statutory authority
- 

##### **Section 12 – Training Requirements**

###### **Comments:**

- No substantive public comment
- 

##### **Section 13 – Internal Controls**

###### **Comments:**

- “Any information” language considered overly broad and unclear

- Clarification requested on meaning of “audit” vs. reporting requirements
  - Concern about scope of entities authorized to conduct audits
- 

#### **Section 14 – Board Websites**

##### **Comments:**

- Concerns regarding:
    - Scope and burden of disciplinary record publication
    - Requirement to maintain historical records (beyond 5 years)
    - Potential conflict with records retention statutes (NRS 239, NRS 241.035)
  - Concern over cost and staffing impact of posting historical disciplinary documents
  - Recommendation to implement requirements prospectively rather than retroactively
  - Request for clarification on terms such as “finalized disciplinary action”
- 

#### **Section 15 – Legislative Tracking**

##### **Comments:**

- Reporting requirements may:
    - Require consultants or additional staff
    - Create financial burden on boards
  - Concern regarding unclear language:
    - “Operations of licensees” considered overly broad
    - Reference to “bank accounts” likely a drafting error
- 

#### **Section 16 – Public Outreach**

##### **Comments:**

- No substantive public comment

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## **Section 17 – Complaints & Investigations**

### **Comments:**

- No substantive public comment

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## **Section 18 – Quarterly Reporting**

### **Comments:**

- Concerns regarding:
  - Duplicative reporting with existing statutory submissions (NRS 622.100)
  - Ambiguity of “any other information requested by the Office”
- Recommendation to allow certification or reuse of existing submissions

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## **Section 19 – Financial Reporting**

### **Comments:**

- Strong concern that requirements are:
  - Duplicative of existing audits (NRS 218G.400)
  - Administratively burdensome
- Concerns with:
  - Required Office-prescribed formats
  - Quarterly reporting timelines (30 days)
- Recommendation to:
  - Use existing financial reports
  - Avoid reformatting requirements

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## **Section 20 – Performance Evaluations**

### **Comments:**

- Concern regarding language stating the Office is not required to modify findings based on board responses
  - Recommendation to revise language to reflect collaborative review process
- 

## **Section 21 – Recommendations & Referrals**

### **Comments:**

- No substantive section-specific comment
- 

## **5. General Public Comment**

### **Key Themes Across Stakeholders:**

- Concern that:
    - Feedback from prior workshops has not been incorporated
    - Regulation may exceed statutory authority under NRS 232.8415
  - Perception that regulation:
    - Creates additional administrative and financial burdens
    - Lacks clear funding mechanisms, particularly for smaller boards
  - Concern regarding:
    - Duplicative reporting requirements
    - Ambiguous language (e.g., “format prescribed,” “reasonably related”)
  - Requests for:
    - Greater clarity on performance evaluation criteria
    - More emphasis on support vs. enforcement
  - Operational concerns raised, including:
    - Procurement delays
    - Transition issues with state systems (e.g., training platforms)
-

## **6. Closing**

- No further public comment was offered
  - Workshop was adjourned by Ms. Haag
- 

## **7. Summary of Key Issues Identified**

- Ambiguity in regulatory language
- Potential conflicts with existing statutes
- Administrative and financial burden on boards
- Duplication of existing reporting requirements
- Need for clearer alignment with statutory authority



**STATE OF NEVADA**  
**BOARD OF DISPENSING OPTICIANS**

4790 Caughlin Pkwy #241, Reno, NV 89519 • Telephone 775 / 433-1700 • Fax 775 / 433-1705  
Email: [info@nvopticians.org](mailto:info@nvopticians.org) • Website: [www.nvbdo.nv.gov](http://www.nvbdo.nv.gov)

March 23, 2026

Office of Nevada Boards, Commissions, and Councils Standards  
Department of Business and Industry  
[Nikki.Haag@business.nv.gov](mailto:Nikki.Haag@business.nv.gov)

***Re: Proposed Regulation R074-25***

To the Office of Boards, Commissions, and Councils Standards:

The Board of Dispensing Opticians appreciates the opportunity to submit written comments pertaining to the February 23, 2026, draft of Proposed Regulation R074-25, in anticipation of the March 31, 2026, workshop.

While our board recognizes the intent and potential of the regulation to improve oversight and consistency across the occupational licensing boards, we would like to highlight the need for additional funding to successfully implement the proposed provisions. The responsibilities outlined in the regulation will require licensing boards to expand their administrative functions, update their online systems, and perform additional reporting and enforcement activities. These new obligations will inevitably result in increased costs, including staffing, technology upgrades, and ongoing operational expenses.

Many of the occupational licensing boards operate with limited budgets that are already stretched thin by their existing statutory responsibilities. Your own office has recently completed audits indicating that many licensing boards may require additional funding to meet their current obligations. These findings indicate that boards are not presently positioned to absorb further responsibilities without financial support. Without additional resources, these new requirements could lead to delays and reduced services for the license holders and public. It is important that the financial burden associated with the proposed regulation not be absorbed solely by the licensing boards themselves. Instead, the Office of Boards, Commissions, and Councils Standards should take responsibility for identifying and securing the necessary funding to support its implementation. This approach will help ensure that the regulation achieves its intended outcomes without placing undue strain on existing board resources or requiring excessive fee increases for license holders.

In addition to funding concerns, our board would like to reiterate the following considerations we included in our letter submitted to your office on November 14, 2025:

Our primary concern is that the current regulation does not adequately develop the underlying statutes, NRS 232.8413, and 232.8415, or reflect their intent. Specifically, it does not define or clarify the powers and duties of the Office of Nevada Boards,

Commissions and Councils Standards, created under NRS 232.8413... [The proposed regulation does not specify or outline] the structure of the department, the scope of its powers, or...its responsibilities. The current draft primarily focuses on the responsibilities and operations of the boards and commissions under the purview of the Office, rather than defining the role of the Office itself. The regulation should clarify the scope of authority and the specific responsibilities of the Office to enable the implementation of its functions.

Additionally, the regulation does not define several key terms that are essential to understanding the Office's mandate. NRS 232.8415 lists the primary function of the Office as centralized administration, and tasks it with the creation of a uniform set of standards for investigations, licensing and discipline, internal controls, legal representation, and structural standards, as well as ensuring consumer protection, efficacy, and efficiency. However, "centralized administration" is not defined anywhere in the regulation, and there are no individual sections outlining specific standards or instructions for investigations, licensing and discipline, internal controls, legal representation, or structural standards. Likewise, "consumer protection," "efficacy," and "efficiency" are still vague, undefined terms. The regulation grants the Office the ability to audit the boards for performance, but does not list any of the standards by which they may be audited.

Another concern is that much of the language in the regulation recites already existing laws, and duplicates many of the boards' responsibilities related to data reporting... These mandates will further burden the already overtaxed staff and monetary resources of many of the smaller boards. The regulation also mandates that the boards create their own searchable online databases for disciplinary actions, as well as keep copies of all statutorily required reports on their websites. Much of this information is currently supplied by the boards upon receipt of public records requests, however, maintaining all this information on a website will be burdensome and expensive.

In some instances, the regulation appears to create duties or powers not explicitly authorized by the statute, that are possibly beyond the scope of legislative intent. For example, boards are mandated to track bills during the legislative session, and to supply reports on their financial information to the Office, but there does not seem to be authority for this in the underlying statute...

To address these concerns, the Board of Dispensing Opticians respectfully suggests revisions to focus more directly on the powers, duties, and limitations of the Office itself. Additionally, providing clear definitions for the key terms used within the regulation would facilitate compliance, and ensure the Office's operations align with legislative intent of the underlying statutes.

Thank you for your time and consideration,

Jennifer Letten  
Board President

Corinne Sedran  
Executive Director

**Governor**  
*Joe Lombardo*

**Executive Director**  
*Ellisabeth Barnard*



**Board Members**  
*Chair – Rebecca Dorangricchia*  
*Vice Chair – Paula Wilber*  
*Secretary-Treasurer – Jenn Ty*  
*Lorna Benedict*  
*Alan Kite - Swinden*  
*Rosemarie Mueller*  
*Bill Schoen*  
*John Teng*  
*Reflexology Member - Vacant*  
*LVMPD Advisory Member – Vacant*

## **Nevada State Board of Massage Therapy**

March 23, 2026

Nikki Haag, Deputy Director  
Office of Nevada Boards, Commissions and Councils Standards  
Department of Business and Industry  
1830 E. College Pkwy, Suite 100  
Carson City, NV 89706

Re: Proposed Regulation R074-25RP3

Dear Ms. Haag,

The Nevada State Board of Massage Therapy ("Board") appreciates the diligent work undertaken by the Office of Nevada Boards, Commissions and Councils Standards ("Office") to promulgate regulations pursuant to Nevada Revised Statutes 232.8413(2). The Board wishes to provide comments on the current proposed regulations with consideration of the duties of the Office, current requirements on Board staff, and capabilities of the Board.

Feedback regarding specific sections is as follows:

### Section 12

This section requires the Executive Director to notify board members of the training provided by the Attorney General's Office. The Attorney General's Office has provided links to prior recordings and slide decks on their website; the Board provides that to each Board member shortly after their appointment. NRS 622.200 is not clear whether Board members must attend the training in person or retake it when it is subsequently offered. The Attorney General's Office does provide mailed notice of in-person training that may not arrive with sufficient time for Board members to rearrange their busy schedules. We would request revision to account for notice being provided to the Executive Director of such trainings occurring in a timely manner. We also request clarity as to whether the training shared on the Attorney General's Office website is sufficient, or whether in person training is required. If training is required in person, then recognition that the trainings are typically held in person every other year would be requested.

### Section 14

The requirements in Subsection (1)(i) and (j) seem simple and the Board applauds the intent to increase transparency. While the Board is happy to work towards having this information available online, our current licensing platform does not fully support the proposed requirement as stated. True compliance would require changes to the current way our search results are provided. And would incur substantial costs to the Board to make this change.

1755 E. Plumb Lane, Suite 252 Reno, NV 89502  
Phone: 775.687.9955 Fax: 775.786.4264 [www.massagetherapy.nv.gov](http://www.massagetherapy.nv.gov)

The Board currently allows a consumer to verify a license from its main page. When a consumer clicks the "verify license" link, the consumer is taken to a page where they can search by name, license number, and/or license type. Once the consumer enters the desired search criteria, the page displays the name, license number, the status of the license, and the location of the licensee. It also contains a link for additional details which, if the licensee has had discipline, will briefly describe the discipline imposed by the Board. The Board does not currently have capabilities to include a link to the actual Findings of Facts, Conclusions of Law, and Order, or other disciplinary documents.

Our current database provider indicates it can support the requested changes, though it may not be timely implemented due to their processes. They gave a rough estimate of approximately \$15,000 to \$20,000 to implement those changes. The estimate may change depending on the final scope needed to meet the proposed regulatory changes.

Subsection (1)(k) - The Board accepts complaints via many methods, including a form available on the website, phone calls, in person visits, and mail. This requirement would seem to direct that complaints could only be accepted via an online system. We would ask for clarification that a consumer may file a complaint by any of the methods, including, without limitation, by using the form.

Subsection (1)(p) - The term "performance data" is very broad. While the Board embraces transparency, the broadness of this requirement may discourage public sharing of information out of apprehension that it should also be added to the website. Conversely, to potentially comply, there may be unnecessary information posted, creating a cluttered and difficult to read website. We would ask for clarification of what is meant by "performance data" and when such information is required to be posted to the Board's website.

#### Section 15

The Board endeavors to maintain awareness of legislative activities during each legislative session. The language of this section, however, would demand substantial staff time, adding a seasonal employee, or contracting with a government relations firm. Subsection 1 requires the Board to track all bills which may impact the Board's operations or its licensees. While seemingly simple, many times a bill that on its face does not appear to impact the Board or its licensees can in fact impact the Board and its licensees. Bills can also be amended, creating an impact when there was not an impact before. Additionally, having to create a report 60 days after session is concluded with detailed information regarding the bills, whether they became law, and their impact on licensees creates another workflow adding more strain on staff time.

Complying with this section will either require funds or take away from current activities beyond what is required during session. There is no clear timeframe articulated on when a board would need to ensure their awareness of bills. Bills often undergo changes throughout session, creating additional challenges to compliance.

#### Section 17

Subsection 3 – Complaints can be complex and an investigation may be needed to fully determine jurisdiction. We would recommend revising to allow for some sort of investigation to determine jurisdiction.

Subsection 5 – This is noted to be only applicable to subsection 4, however it would potentially create conflict with subsection 3.

Section 18

Subsection 1 - As noted, the Board is required by NRS 622.100 to make quarterly reports to the Legislative Counsel Bureau. Will a link to this report be sufficient?

Subsection 3 - The Board has been responsive, cooperative, and transparent in providing information as requested by the Office. However, this subsection is overly broad and creates concerns that the Office may generate additional tasks for Board staff creating burdens in addition to their daily duties.

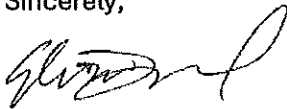
General comments on the proposed regulation

Some of the proposed regulations create specific repetition of tasks with which the Board must already comply. Further, while there are many requirements presented for the Board to comply with, there are no reciprocal requirements of what the Office is required to provide to support this or other boards in compliance with existing or proposed requirements.

Additionally, nothing in this proposed regulation assists any board with added efficiency. What would be helpful would be some commitment by the Office to assist boards with complying with the requirements of NRS and NAC chapter 333. For example, many statewide contracts require access to NevadaEPro or Advantage. This Board has not been able to get approval to access either of those systems to properly follow State Purchasing requirements.

Thank you for the opportunity to comment on the Office's proposed regulation. The Board may provide additional comments during Public Workshops and Hearings as these regulations are fine tuned.

Sincerely,



Elisabeth Barnard

March 31, 2026

Ms. Nikki Haag  
Deputy Director  
Office of Nevada Boards, Commissions, and Council Standards  
Department of Business and Industry

Ms. Nikki Haag:

The Nevada Board of Professional Engineers and Land Surveyors has taken this opportunity to review and comment on the Department of Business and Industry's proposed regulation changes, referred to as Proposed Regulations of the Department of Business and Industry b-Office of Nevada Boards, Commissions, and Council Standards LCB File No. R074-25RP3, as drafted on February 23, 2026.

The Nevada Board of Professional Engineers and Land Surveyors (NVBPELS) is fully committed to any and all practices that improve accountability, transparency and efficiency and it is in this light that we have taken the time to thoroughly review your draft regulations to provide you with thoughtful commentary and meaningful revisions. Our comments and revisions are enumerated below and collected in a Word Document mark-up file; attached for your review.

My overarching concerns associated with the proposed regulation updates (LCB File No. R074-25 Feb 23, 2026) are as follows. There are many sections with reporting requirements that include the open ended statement "in the format prescribed by the office"; and we have no idea what the formats will look like and cannot accurately account for the likely cost burdens to the board that will follow if statements like this permeate the Regulation.

Another area of concern is Section 15.2(a)(b)(c)(d) & Section 3(a)(b)(c)- We currently track legislation. However, this added requirement for reporting will most likely require this Board to engage the services of consultant versed in the legislative process, if allowed. If we are not able to contract with an outside consultant, we would need to bring additional staff (costs could be in the \$100k range). The additional cost burdens associated with the additional reporting and legislative attendance will likely require this Board to increase fees.

Our annual board budget is based upon a Zero net fund increase/decrease. We use our reserves to work on deferred projects, currently we're updating our online platforms and completing our move to a paperless office with deferred funds.

*Section 10, Defining the word "purview" in this regulation change looks to me to be statutory change within the regulatory process.*

*Section 14.1(j)(5), This is covered in NRS 625.425.*

*Section 14.1.(l), NVBPELS has a CPA prepare financial reports on a monthly basis. Additionally, we are audited by a separate auditing firm on annual basis. This report is submitted to the State and Dept of Business & Industry every year. Quarterly reporting is redundant and excessive, and will be a cost burden to the Board.*

*Our annual board budget is based upon a Zero net fund increase/decrease. We use our reserves to work on deferred projects, currently we're updating our online platforms and completing our move to a paperless office with deferred funds. This could be done by the Office.*

*Section 15.2(a)(b)(c)(d) & Section 3(a)(b)(c)- We currently track legislation. However, this added requirement for reporting will most likely require this Board to engage the services of consultant versed in the legislative process, if allowed. If we are not able to contract with an outside consultant, we would need to bring on additional staff (costs could be in the \$100k range).*

*The additional cost burdens associated with the additional reporting and legislative attendance will require this Board to increase fees.*

*Section 19.2 (a)(b), We have a CPA who prepares financial reports monthly and we have a professional auditor who prepares an annual audit report which is submitted to the LCB Legislative Auditor and the Department of Business and Industry on or before December 1 of each year. As mentioned earlier in this update, there could be additional expenses incurred by the Board. Reporting to the Office on forms proscribed by the Office will have cost implications on this Board. We have and will continue to prepare monthly financial statements. Quarterly reporting is additional work.*

*Section 19.3 (a)(b)(c), Quarterly reports - Additional cost burden to Board.*

*Section 20.2, This sentence should be re-written. A written response from a board should merit the Office being required to modify its findings and conclusions based upon the information submitted by the board.*

We know this is long arduous process that requires time, hard work, and compromise. We are committed to this process and working with the Department of Business and Industry and the Office as we work together to draft regulations that best serve our great State and its citizens.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark J. Fakler', written in a cursive style.

Mark J Fakler, PE  
Executive Director.

## **Public Workshop Minutes**

### **Office of Nevada Boards, Commissions, and Councils Standards Workshop on Proposed Regulation R074-25**

**Date:** November 25, 2025

**Time:** 1:00 PM

**Location:** 1818 College Parkway, Suite 103A, Carson City, NV 89706 (with virtual participation)

---

#### **1. Call to Order**

The workshop was called to order by Nikki Haag, Deputy Director, Office of Nevada Boards, Commissions, and Councils Standards.

---

#### **2. Opening Remarks**

Ms. Haag provided an overview of the proposed regulation (LCB File No. R074-25), including:

- **Authority under NRS 232.8413 and NRS 232.8415**
- Purpose to establish:
  - Uniform administrative standards
  - Transparency and accountability measures
  - Consistency across boards and commissions
- Clarification that:
  - The regulations do not alter board statutory authority
  - Boards retain full authority over licensing, investigations, and discipline
- Statement that the draft:
  - Is not final and intended for stakeholder input
  - Has been reviewed in coordination with the Attorney General's Office

Additional clarifications addressed:

- No conversion of boards into advisory bodies

- No transfer of disciplinary authority
  - No intent to create duplicative reporting, but to streamline oversight
  - Determination that no small business impact analysis was required
- 

### **3. Initial Public Comment**

#### **Key Themes Raised:**

- **Statutory Authority Concerns**
    - Questions regarding whether the proposed regulations exceed authority granted under NRS 232.8413 and 232.8415
  - **Confidentiality and Investigations**
    - Concerns regarding access to investigative files and lack of statutory citation
  - **Performance Evaluations**
    - Requests for clear metrics and criteria in advance
  - **Reporting Requirements**
    - Concerns regarding broad and open-ended language
  - **Process Concerns**
    - Lack of stakeholder engagement and limited working group collaboration
- 

### **4. Section-by-Section Review and Public Comment**

The Office reviewed the proposed regulation section-by-section, allowing public comment after each section.

---

#### **Definitions (Sections 2–8)**

##### **Comments:**

- Suggestion to use “occupational board” for clarity
  - Concern regarding use of “purview” and ambiguity
-

## **Section 9 – Definition of Purview**

### **Comments:**

- “Administrative oversight” viewed as vague and insufficiently defined
- 

## **Section 10 – Board Structure & Attendance**

### **Comments:**

- Concern that language such as “establish the expectation” is not enforceable
  - Recommendation for clear, enforceable standards rather than policy-based expectations
- 

## **Section 11 – Training Requirements**

### **Comments:**

- Minimal comment
- 

## **Section 12 – Internal Controls**

### **Comments:**

- Requests for clarification of:
    - “Accurate and verifiable”
    - Types of “audits” referenced (financial vs. administrative)
- 

## **Section 13 – Website Requirements**

### **Comments:**

- Concerns regarding:
  - Posting personal contact information of board members (safety and statutory conflicts)
  - Definition of “recent” financial information
  - Scope of required historical records (agendas/minutes)

- Definition of “performance data”
- 

## **Section 14 – Legislative Tracking**

### **Comments:**

- Viewed as:
    - Unnecessary administrative burden
    - Outside scope of board responsibilities
  - Concern regarding requirement to translate information into Office-prescribed formats
- 

## **Section 15 – Public Outreach**

### **Comments:**

- Minimal comment
- 

## **Section 16 – Complaints & Investigations**

### **Comments:**

- Concerns regarding:
    - Requirement to investigate all complaints regardless of jurisdiction
    - Broad authority for Office to request investigative files
    - Confidentiality conflicts with existing statutes
    - Use of legal terms such as “probable cause”
  - Recommendation to clarify jurisdictional limits and statutory alignment
- 

## **Section 17 – Quarterly Reporting**

### **Comments:**

- Concerns regarding:

- “Any other information requested” as overly broad
  - Lack of statutory deadlines for some boards
- 

## **Section 18 – Financial Reporting**

### **Comments:**

- Strong concerns regarding:
    - Duplicative reporting requirements
    - Inconsistent deadlines
    - Burden of Office-prescribed formats
  - Questions regarding:
    - Use of financial data
    - Potential risk of fund reallocation
  - Recommendation to align reporting requirements and avoid redundancy
- 

## **Section 19 – Performance Evaluations**

### **Comments:**

- Concerns that:
  - Office lacks statutory authority to:
    - Conduct audits
    - Require corrective action
- Recommendation to:
  - Limit authority to recommendations only
  - Establish collaborative approach
- Request for:
  - Defined timelines
  - Clear evaluation criteria

---

## **Section 20 – Enforcement / Corrective Action**

### **Comments:**

- Concerns that:
    - Provisions exceed statutory authority
    - References to withholding support are inconsistent with current structure
  - Recommendation to:
    - Remove enforcement language
    - Retain referral authority to the Governor only
- 

## **5. General Public Comment**

### **Key Themes:**

- Concern regarding:
    - Regulatory overreach
    - Impact on board independence
    - Increased administrative burden and costs
  - Requests for:
    - Additional time for review
    - Greater stakeholder collaboration
    - Clarification of authority and limits
  - Emphasis on:
    - Maintaining board autonomy
    - Ensuring regulations remain within statutory scope
- 

## **6. Closing Remarks**

Ms. Haag:

- Thanked participants for their input
  - Reaffirmed that:
    - The goal is to enhance accountability, transparency, and efficiency
    - The process will remain collaborative and iterative
  - Confirmed that feedback will be incorporated into continued work with the Legislative Counsel Bureau (LCB)
- 

## **7. Adjournment**

The workshop was adjourned following final public comment.



# NEVADA ASSOCIATION OF LAND SURVEYORS

526 South E Street – Santa Rosa, CA 95404

T: (888) 994-3510 E: nals@nvlandsurveyors.org

November 12, 2025

Office of Nevada Boards, Commissions, and Councils Standards  
Department of Business and Industry  
1830 College Parkway, Suite 100  
Carson City, NV 89706

RE: Comments on Proposed Regulation – LCB File No. R074-25

Dear Director:

On behalf of the Nevada Association of Land Surveyors (NALS), we appreciate the opportunity to provide comments regarding the Proposed Regulation of the Department of Business and Industry Office of Nevada Boards, Commissions, and Councils Standards (Office) (LCB File No. R074-25).

NALS recognizes and supports the intent of this regulation to promote transparency, accountability, and consistent practices among Nevada's occupational licensing boards. However, we wish to express several concerns regarding the potential administrative, operational, and governance impacts on the Nevada Board of Professional Engineers and Land Surveyors (NVBPELS) and other Boards and Commissions.

#### **Increased Administrative and Reporting Burden**

The proposed regulation requires quarterly reporting on complaints, licensing data, financial summaries, and legislative tracking. These duplicative reporting requirements would significantly increase administrative workload and divert staff resources from essential regulatory and enforcement functions. NVBPELS already fulfills reporting obligations under NRS 622.

#### **Reduction of Board Autonomy**

While the regulation acknowledges each Board's fiscal independence, it grants the Office broad authority to issue corrective actions, require documentation of investigations, and recommend member removal. This undermines the independent, profession-driven governance structure that ensures public protection through technical expertise rather than political oversight.

#### **Overreach of Centralized Control**

The level of oversight proposed, particularly the ability to require additional data submissions and impose corrective timelines, appears to exceed the legislative intent of NRS 232.8415. For a specialized, self-funded Board such as NVBPELS, this could result in operational delays and the erosion of professional self-regulation.

#### **Financial and IT Impacts**

The required expansion of reporting will likely necessitate new software systems, staffing, and IT additions. These expenses could require an increase in licensee fees which would be an outcome contrary to efficient government operation.

NVBPELS has consistently demonstrated responsible self-governance, efficient operations, and strong public protection. We strongly believe that consistency and transparency can be achieved without compromising the independence or effectiveness of Nevada's professional licensing boards.

NALS opposes the proposed regulation – LCB File No. R074-25 and we respectfully urge the Office to, at minimum, consider revising the regulation to clarify limits of oversight and engage stakeholders in collaborative development of reporting standards.

Thank you for your commitment to responsible governance and public protection.

Respectfully submitted,

Nick Ariotti, PLS  
President



**STATE OF NEVADA**  
**BOARD OF DISPENSING OPTICIANS**

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November 14, 2025

Ms. Nikki Haag, Deputy Director  
Office of Nevada Boards, Commissions, and Councils Standards  
Department of Business and Industry  
1830 E. College Pkwy, Suite 100  
Carson City, NV 89706

***Re: Proposed Regulation R074-25***

Dear Ms. Haag:

The Board of Dispensing Opticians appreciates the opportunity to submit written comments pertaining to Proposed Regulation R074-25, which is scheduled for a workshop on November 25, 2025. While we previously submitted notes to your office on October 10<sup>th</sup>, we were informed your office submitted an updated draft of the regulation to the Legislative Counsel Bureau, so we would like to update our comments and requests for revisions.

Our primary concern is that the current regulation does not adequately develop the underlying statutes, NRS 232.8413, and 232.8415, or reflect their intent. Specifically, it does not define or clarify the powers and duties of the Office of Nevada Boards, Commissions and Councils Standards, created under NRS 232.8413. There are only two general sections included in the regulation, "General Provisions", and "Department; powers and duties," and neither specifies, or even outlines, the structure of the department, the scope of its powers, or any of its responsibilities. The current draft primarily focuses on the responsibilities and operations of the boards and commissions under the purview of the Office, rather than defining the role of the Office itself. The regulation should clarify the scope of authority and the specific responsibilities of the Office to enable the implementation of its functions.

Additionally, the regulation does not define several key terms that are essential to understanding the Office's mandate. NRS 232.8415 lists the primary function of the Office as centralized administration, and tasks it with the creation of a uniform set of standards for investigations, licensing and discipline, internal controls, legal representation, and structural standards, as well as ensuring consumer protection, efficacy, and efficiency. However, "centralized administration" is not defined anywhere in the regulation, and there are no individual sections outlining specific standards or instructions for investigations, licensing and discipline, internal controls, legal representation, or structural standards. Likewise, "consumer protection," "efficacy," and "efficiency" are still vague, undefined terms. The regulation grants the Office the ability to audit the boards for performance, but does not list any of the standards by which they may be audited.

Another concern is that much of the language in the regulation recites already existing laws, and duplicates many of the boards' responsibilities related to data reporting. The regulation would require boards' staff to not only submit copies of any statutorily required reports to the Office, but also to include summaries of the reports, or restate the information in each report on Office-approved forms. These mandates will further burden the already overtaxed staff and monetary resources of many of the smaller boards. The regulation also mandates that the boards create their own searchable online databases for disciplinary actions, as well as keep copies of all statutorily required reports on their websites. Much of this information is currently supplied by the boards upon receipt of public records requests, however, maintaining all this information on a website will be burdensome and expensive.

In some instances, the regulation appears to create duties or powers not explicitly authorized by the statute, that are possibly beyond the scope of legislative intent. For example, boards are mandated to track bills during the legislative session, and to supply reports on their financial information to the Office, but there does not seem to be authority for this in the underlying statute. Likewise, the regulation states that boards that do not comply with the standards approved by the Office for efficacy and efficiency will be subject to discipline, including potential removal actions by the Governor's Office, or the withholding of administrative or fiscal support services. There is no statutory reference for these enforcement actions, and no mention of any administrative or fiscal support services anywhere else in the regulation, so it is unclear which services may be withheld.

To address these concerns, the Board of Dispensing Opticians respectfully suggests revisions to focus more directly on the powers, duties, and limitations of the Office itself. Additionally, providing clear definitions for the key terms used within the regulation would facilitate compliance, and ensure the Office's operations align with legislative intent of the underlying statutes.

Thank you for your time and consideration,

Jennifer Letten  
Board President

Corinne Sedran  
Executive Director



# NEVADA ASSOCIATION OF LAND SURVEYORS

526 South E Street – Santa Rosa, CA 95404

T: (888) 994-3510 E: nals@nvlandsurveyors.org

November 12, 2025

Office of Nevada Boards, Commissions, and Councils Standards  
Department of Business and Industry  
1830 College Parkway, Suite 100  
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RE: Comments on Proposed Regulation – LCB File No. R074-25

Dear Director:

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NALS recognizes and supports the intent of this regulation to promote transparency, accountability, and consistent practices among Nevada's occupational licensing boards. However, we wish to express several concerns regarding the potential administrative, operational, and governance impacts on the Nevada Board of Professional Engineers and Land Surveyors (NVBPELS) and other Boards and Commissions.

#### **Increased Administrative and Reporting Burden**

The proposed regulation requires quarterly reporting on complaints, licensing data, financial summaries, and legislative tracking. These duplicative reporting requirements would significantly increase administrative workload and divert staff resources from essential regulatory and enforcement functions. NVBPELS already fulfills reporting obligations under NRS 622.

#### **Reduction of Board Autonomy**

While the regulation acknowledges each Board's fiscal independence, it grants the Office broad authority to issue corrective actions, require documentation of investigations, and recommend member removal. This undermines the independent, profession-driven governance structure that ensures public protection through technical expertise rather than political oversight.

#### **Overreach of Centralized Control**

The level of oversight proposed, particularly the ability to require additional data submissions and impose corrective timelines, appears to exceed the legislative intent of NRS 232.8415. For a specialized, self-funded Board such as NVBPELS, this could result in operational delays and the erosion of professional self-regulation.

#### **Financial and IT Impacts**

The required expansion of reporting will likely necessitate new software systems, staffing, and IT additions. These expenses could require an increase in licensee fees which would be an outcome contrary to efficient government operation.

NVBPELS has consistently demonstrated responsible self-governance, efficient operations, and strong public protection. We strongly believe that consistency and transparency can be achieved without compromising the independence or effectiveness of Nevada's professional licensing boards.

NALS opposes the proposed regulation – LCB File No. R074-25 and we respectfully urge the Office to, at minimum, consider revising the regulation to clarify limits of oversight and engage stakeholders in collaborative development of reporting standards.

Thank you for your commitment to responsible governance and public protection.

Respectfully submitted,

Nick Ariotti, PLS  
President



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**BOARD OF DISPENSING OPTICIANS**

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November 14, 2025

Ms. Nikki Haag, Deputy Director  
Office of Nevada Boards, Commissions, and Councils Standards  
Department of Business and Industry  
1830 E. College Pkwy, Suite 100  
Carson City, NV 89706

***Re: Proposed Regulation R074-25***

Dear Ms. Haag:

The Board of Dispensing Opticians appreciates the opportunity to submit written comments pertaining to Proposed Regulation R074-25, which is scheduled for a workshop on November 25, 2025. While we previously submitted notes to your office on October 10<sup>th</sup>, we were informed your office submitted an updated draft of the regulation to the Legislative Counsel Bureau, so we would like to update our comments and requests for revisions.

Our primary concern is that the current regulation does not adequately develop the underlying statutes, NRS 232.8413, and 232.8415, or reflect their intent. Specifically, it does not define or clarify the powers and duties of the Office of Nevada Boards, Commissions and Councils Standards, created under NRS 232.8413. There are only two general sections included in the regulation, "General Provisions", and "Department; powers and duties," and neither specifies, or even outlines, the structure of the department, the scope of its powers, or any of its responsibilities. The current draft primarily focuses on the responsibilities and operations of the boards and commissions under the purview of the Office, rather than defining the role of the Office itself. The regulation should clarify the scope of authority and the specific responsibilities of the Office to enable the implementation of its functions.

Additionally, the regulation does not define several key terms that are essential to understanding the Office's mandate. NRS 232.8415 lists the primary function of the Office as centralized administration, and tasks it with the creation of a uniform set of standards for investigations, licensing and discipline, internal controls, legal representation, and structural standards, as well as ensuring consumer protection, efficacy, and efficiency. However, "centralized administration" is not defined anywhere in the regulation, and there are no individual sections outlining specific standards or instructions for investigations, licensing and discipline, internal controls, legal representation, or structural standards. Likewise, "consumer protection," "efficacy," and "efficiency" are still vague, undefined terms. The regulation grants the Office the ability to audit the boards for performance, but does not list any of the standards by which they may be audited.

Another concern is that much of the language in the regulation recites already existing laws, and duplicates many of the boards' responsibilities related to data reporting. The regulation would require boards' staff to not only submit copies of any statutorily required reports to the Office, but also to include summaries of the reports, or restate the information in each report on Office-approved forms. These mandates will further burden the already overtaxed staff and monetary resources of many of the smaller boards. The regulation also mandates that the boards create their own searchable online databases for disciplinary actions, as well as keep copies of all statutorily required reports on their websites. Much of this information is currently supplied by the boards upon receipt of public records requests, however, maintaining all this information on a website will be burdensome and expensive.

In some instances, the regulation appears to create duties or powers not explicitly authorized by the statute, that are possibly beyond the scope of legislative intent. For example, boards are mandated to track bills during the legislative session, and to supply reports on their financial information to the Office, but there does not seem to be authority for this in the underlying statute. Likewise, the regulation states that boards that do not comply with the standards approved by the Office for efficacy and efficiency will be subject to discipline, including potential removal actions by the Governor's Office, or the withholding of administrative or fiscal support services. There is no statutory reference for these enforcement actions, and no mention of any administrative or fiscal support services anywhere else in the regulation, so it is unclear which services may be withheld.

To address these concerns, the Board of Dispensing Opticians respectfully suggests revisions to focus more directly on the powers, duties, and limitations of the Office itself. Additionally, providing clear definitions for the key terms used within the regulation would facilitate compliance, and ensure the Office's operations align with legislative intent of the underlying statutes.

Thank you for your time and consideration,

Jennifer Letten  
Board President

Corinne Sedran  
Executive Director



State of Nevada  
**Board of Environmental Health Specialists**

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October 10, 2025

Office of Nevada Boards, Commissions and Council Standards  
1830 College Parkway, Suite 100  
Carson City, NV 89706

Comments on Proposed Regulation  
Workshop – October 17, 2025

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The Board has not had an opportunity to convene a public meeting to discuss or provide comments on the proposed regulation prior to the October 10<sup>th</sup> deadline for submitting written comments.

The written comments contained herein are submitted as an interested person, and subject matter expert with many years of experience in Board administration.

The major point of concern is the lack of clarity in the duties of the Office as they pertain to “centralized administration”. The following points would clarify the role and duties of the Office as the centralized administrative entity for oversight and compliance:

1. The Office shall:
  - a. provide oversight of and compliance with State administrative requirements pertinent to Board administration
  - b. serve as the primary point of contact for Board administrators
  - c. coordinate with state agencies relating to compliance with any statutory administrative provisions that apply to Boards
  - d. coordinate Board access to State systems necessary for compliance with state administrative requirements
  - e. communicate administrative directives, all- agency memorandums, and applicable law and regulatory requirements and revisions pertinent to Board administration
  - f. monitor compliance with the administrative standards established through this regulation.

Ongoing open dialogue between stakeholders and the Office will foster greater transparency and trust throughout the regulation adoption process.

Respectfully submitted,

*Loretta Ponton*

Loretta L. Ponton, Executive Director

**Frank DiMaggio, Executive Director of Nevada State Board of Osteopathic Medicine**

**Comments for B&I Public Workshop on Regs- 11/25/2025 – 1pm**

**B&I:** refers to the Nevada Department of Business and Industry

**Office:** refers to the Office of Nevada Boards, Commissions, and Councils Standards within B&I.

In addition to my forthcoming comments, I also echo and list for the record all the concerns and comments set forth in the Summary of Input from Boards and Executive Directors on the Proposed Regulations listed on the B&I website under the “Board & Commissions” tab, then under the heading of “Proposed Regulations”.

I also echo and list for the record the comments of the other five speakers who proceeded my comments at this Workshop.

**NRS 232.8413(2)** requires B&I to “adopt the necessary regulations and procedures to effectively administer the responsibilities of the Office.” Those responsibilities are set forth in **NRS 232.8415(1)**. Accordingly, those 2 statutes allow B&I authority to set its own internal administrative rules to administer its responsibility. No statutory authority is given for B&I establish regulations requiring Boards to act in any specific way. See sections 10, 11, 12, 14, 16, and 17-20 of R074-25P.

Neither **NRS 232.8413** nor **232.8415** define the term “purview”. However, B&I has defined “purview” to mean “administrative oversight” (**R074-25P, Sec. 9.**) No authority is given for B&I to define the words used in those two statutes. Furthermore, the definition given does not provide clarity or specificity, but rather creates a vague and ambiguous term “administrative oversight”.

Various sections of **R074-25P** establish requirements for the Nevada State Board of Osteopathic Medicine (“the Board”) not set forth in any other statute or regulation of the Board. Accordingly, these regulations are an attempt to replace the statutory or regulatory scheme established by NRS 633 and NAC 633. Examples of the various sections of **R074-25P** which establish requirements for the boards are as follows:

**Sec. 10-** requires the boards “under its purview” to adopt a policy regarding board member absences from board meetings.

**Sec. 11(1)-** requires the Executive Director to notify board members of required trainings.

**Sec. 11(2)-**requires boards to provide written notice to the Office confirming that a board member has completed the required training.

**Sec. 14(1)**- requires boards to track certain bills and **14(2)** requires each board to submit a report to the Office of bills tracked; potential impact of each bill; any actions required by the board to implement any bill; and estimated timeline for the board to implement any bill. **Sec. 14(3)** requires the board to notify the Office once the board has implemented the bill.

**Sec. 16(5)**- requires boards to provide to the Office any files, documents, data, or other information relating to an investigation conducted by the boards, including any disciplinary action. In addition to the unauthorized mandate to do so, this may violate certain confidentiality statutes, such as NRS 633.301.

**Sec. 17**- requires boards to submit information to the Office, which information is already being reported to statutes set forth in said regulation as well as “any other information requested by the Office”.

**Sec. 18(2)** requires boards to submit a copy of the balance sheet or report of a required audit; a simplified financial report quarterly; another simplified financial report not later than 9 months after the close of the fiscal year, summarizing the finances of the boards that that fiscal year.

**Sec. 19(2)**- requires boards to cooperate with the Office in any performance evaluation conducted by the Office and provide any information to the Office “that the Office has determined is necessary to assess the efficiency and effectiveness of the operations of the board.”

**19(3)**- requires boards to take corrective action to improve efficiency and effectiveness, reduce costs, or enhance consumer protections.

**Sec. 20(1)**- requires boards to take corrective action based upon the Office’s determination that boards have failed to comply with the requirements set forth in Sec. 2-Sec 20 inclusive.

**Sec. 20(2)**- allows the Office to assess penalties to boards falling to take the Office’s corrective actions.

**If these regulations as proposed are approved**, they will require additional expenditure of Board staff time or perhaps hiring of additional staff, thereby necessitating the Board to seek an increase in its fees charged to its licensees. This Board has not increased its licensing fees since 2013 (12 years) and most likely since the early 2000’s from what I could quickly determine.

**Nevada Attorney General’s Administrative Rulemaking Guide- 10<sup>th</sup> edition 2023-** requires the following:

Page 4- imposition of penalties require specific statutory authorization.

**Comment:** No specific statutory authorization exists for the Office to impose any penalties such as set forth in Sec. 20 of R074-25P.

Page 5- Regarding the SBIS requirement in the Nevada Administrative Procedures Act:

“The analysis should be conducted by a knowledgeable employee or through the use of a consultant or independent contractor, and be prepared in consultation with owners and officers of small businesses likely to be affected. As a matter of practice, the agency should submit a Small Business Impact Statement regardless of whether an impact is anticipated- demonstrating to the legislature that the agency reached out to work with small businesses.”

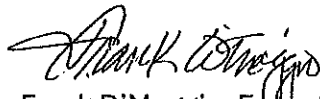
**Comment:** Along with the Notice of this Workshop, a Small Business Impact Statement was included. No indication that a survey of small businesses was conducted or that it was prepared by a “knowledgeable employee or through the use of a consultant or independent contractor and prepared in consultation with owner and officers of small businesses likely to be affected”.

Ms. Haag sent an email on 11/17/2025 stating that proposed regulations were issued on 11/14/2025 and that further revisions to those regulations were made by Ms. Haag, but Ms. Haag had not yet received the updated version. Then, Ms. Haag’s email with a link to **R074-25I** and **R074-25P** was sent yesterday at 12 noon. The Board’s last meeting was on November 12, 2025, and the Board meets monthly except for August. No time was given to allow the Board members to view R074-25P which was submitted to LCB on 11/14/2025. Board members should be given an opportunity at a Board meeting to review such regulation so that they may provide their comments and feedback, but no such opportunity was afforded to the Board members.

I request B&I and the Office to make deletions, revisions, and amendments to **R074-25P** in accordance with the comments set forth and referenced herein.

Thank you for the opportunity to provide these comments.

Sincerely,



Frank DiMaggio, Executive Director  
Nevada State Board of Osteopathic Medicine  
2275 Corporate Circle, Ste. 210  
Henderson, NV 89074  
(702)732-2147

**From:** David James <jamesdrs@gmail.com>

**Sent on:** Monday, November 24, 2025 6:57:25 PM

**To:** BCCS Info <BCCSinfo@business.nv.gov>

**CC:** Mark Fakler <mfakler@nvbpels.nv.gov>; Philip Giles <pgiles@nspe.org>

**Subject:** Proposed Regulation R074-25 comment, concern: additional administrative and financial burden

**WARNING** - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear members of the Legislature and assembled members of the professions and the public,

My name is David E. James, PE. I am a licensed Civil Engineer (license 013388, current through 6/30/2027) in the State of Nevada. My qualifications, license application, and license renewals have been fairly, efficiently and promptly reviewed by the Nevada State Board of Engineers and Land Surveyors (NVBPELS) since 1998.

My comment about proposed Regulation R074-25 pertains to sections 17 and 18 that require boards to "*provide certain quarterly and annual information and reports to the Office relating to complaints, investigatory actions, discipline and licensees*" (section 17), and "*submit certain financial information to the Office on a quarterly and annual basis*"

My concern is that these new reporting functions will increase workload on the current NVBPEPLS members and staff, and that no provision has been made to fund or support the increased workload"

NVBPEPLS self funds its operation through licensing fees, and there will be small business impact

if the board has to raise fees to hire additional professional staff to generate these reports.

As written, proposed R074-25 does not address costs associated with the added workload.

I request that Nevada Business and Industry briefly revise the proposed regulations to

a) allow more flexibility in reporting. For example, NVBPEPLS already generates monthly financial reports which could be submitted instead of quarterly reports (so language such as "monthly, or quarterly, or annual basis" could be used (this would reduce added administrative burdens

by accepting reports already generated and available that meet the intent of the proposed regulations)

and, to facilitate planning and staff time allocation

b) provide a description of the required timing of required report submission (eg "no later than

30 days after the close of each fiscal quarter"

c) provide a brief description of the reporting process, regarding specific content and length,

and

d) name the receiving NBCCS staff member or administrator for the reports; eg. "Reports shall be submitted addressed to the Director

Thank you for the opportunity to comment.

Sincerely,

David E. James, PE (Nevada, Civil license 013388 expiring 06/302027)

email: [jamesdrs@gmail.com](mailto:jamesdrs@gmail.com)

telephone: 702-595-1209

Hi Nikki,

Hope all is well. The regulations are coming along nicely. I understand another draft is in queue from the LCB so some of the questions/inquiries may have already been addressed. Just wanted to put the following on your radar:

- **Section 13 - 1(g)** - Can we please get a time limit on this, perhaps the last 5 years? It would be burdensome for us to attempt to digitize historical minutes. The resources and time involved digitizing historical minutes would exceed the utilization of the digitized records.
- **Section 13 - 1(i)** - Can we add a modifier such as “active licenses” or “active licenses and those revoked, suspended, or surrendered in the prior 10 years?”
- **Section 13 - 1(j)** - Regarding any reference to “disciplinary actions,” this is not defined in the beginning definitions section. Confirming this means complaints that have been settled with probation or resulted in suspension, revocation, or surrender.
- **Section 13 - 1(j)5** - Can we make this either a prospective requirement to start when this regulation passes, or cap with a time limit, such as for cases resolved in the last 5 years? As above, our Board is quite old and a good majority of our disciplinary orders and settlement agreements were not computerized or not stored in a computer in any searchable database, such that trying to track down older disciplinary orders would be burdensome. Further, in the past and potentially before any prohibitions of same, some of our settlement agreements contained confidentiality language.
- **Section 16 - 3** - Can we please get the word investigate changed to review, or in the alternative, get a definition of investigate that contemplates an investigation including a review for initial jurisdiction, and not further investigation if jurisdiction is found lacking? Our own regulations require a jurisdictional review prior to the investigation commencing and a dismissal if there is no jurisdiction, so we cannot comply with this as written.
- **Section 16 - 3(a)(b)** - Regarding these two requirements, they do not correspond to our disciplinary procedures. It is not our filed complaint that documents the results of an investigation; rather, for us, it is a Preliminary Screening Consultant (licensed professional) report that does so. Thus, can we change the wording to “For any

matter under an investigation conducted by or on behalf of a board, the documentation of the investigation must include ...” This makes it more generic to whatever a given Board’s process is.

- **60 days vs 90 days** - Is it possible to make the number of days to remedy/corrective action the same time frame?

**A.L. Higginbotham**

**Executive Director - Nevada State Board of Dental Examiners**

2651 N. Green Valley Parkway, Suite 104

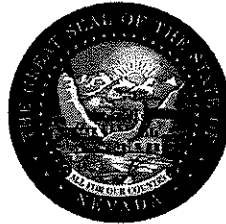
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JOE LOMBARDO  
Governor

DR. KRISTOPHER SANCHEZ  
*Director*

**STATE OF NEVADA**



PERRY FAIGIN  
NIKKI HAAG  
MARCEL F. SCHAEERER  
*Deputy Directors*

CATHY DINAUER  
*Executive Director*

**DEPARTMENT OF BUSINESS AND INDUSTRY  
OFFICE OF NEVADA BOARDS, COMMISSIONS AND COUNCILS STANDARDS**

**NEVADA STATE BOARD OF NURSING**

November 17, 2025

Nikki Haag  
Deputy Director  
Office of Nevada Boards, Commissions, and Councils Standards  
Department of Business and Industry

RE: Comments for Workshop on R074-25I

Deputy Director Haag,

Please accept the attached comments on the proposed regulation amendments contained in LCB File R074-25I. Further comments will be provided, if necessary, after LCB releases R074-25P.

Why is a regulation necessary to require Boards to provide to the Office reports already required by NRS 622.100, NRS 218G.400, NRS 331.110, and NRS 333.705? It would seem logical for the Office to request the consolidated data from the Legislative Counsel Bureau, the Legislative Auditor, the Administrator of the State Public Works Division of the Department of Administration, or the Interim Finance Committee. I would recommend those agencies collect information for later distribution to the Office, rather than collecting the information from 37 Boards.

Under the broad category of providing information to the Office involving investigations and investigation timelines, there is a question of confidentiality. If confidentiality is required by a Board's statute, then can the Office waive that confidentiality statute by a regulation?

Why is a regulation necessary requiring Boards to follow the Nevada Open Meeting Law when already in statute?

Finally, placing responsibility on Boards to pay for an amount of cost allocation charges that may or may not be set in statute at some future date to fund the Office does not seem appropriate.

Cathy Dinauer, MSN, RN  
Executive Director  
Nevada State Board of Nursing

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**Reno:** 6005 Plumas St., Suite 100, Reno, Nevada 89519 - Telephone (888) 590-6726 - Fax (775) 687-7707

**Las Vegas:** 4220 S. Maryland Pkwy., Building B, Suite 300, Las Vegas, Nevada 89119 - Telephone (888) 590-6726 - Fax (702) 486-5803  
[www.nevadanursingboard.org](http://www.nevadanursingboard.org)

November 18, 2025

Ms. Nikki Haag  
Deputy Director  
Office of Nevada Boards, Commissions, and Council Standards  
Department of Business and Industry

Ms. Nikki Haag:

The Nevada Board of Professional Engineers and Land Surveyors has taken this opportunity to review and comment on the Department of Business and Industry's proposed regulation changes, referred to as Proposed Regulations of the Department of Business and Industry b-Office of Nevada Boards, Commissions, and Council Standards LCB File No. R074-25, as drafted on November 5, 2025.

The Nevada Board of Professional Engineers and Land Surveyors (NVBPELS) is fully committed to any and all practices that improve accountability, transparency and efficiency and it is in this light that we have taken the time to thoroughly review your draft regulations to provide you with thoughtful commentary and meaningful revisions. Our comments and revisions are enumerated below and collected in a Word Document mark-up file; attached for your review.

*NAC 232.010 Definitions. (NRS 233B) As used in NAC 232.010 to 232.140, inclusive, unless the context otherwise requires: 11. "Purview" means the scope of authority, oversight and administrative responsibility assigned to the Office pursuant to NRS 232.8415, including oversight of the boards and commissions enumerated in NRS 232.8415(2).*

*Section 1, This is very broad language - not limited to what is listed. This could lead to regulation by Office policy and or procedure.*

*Section 1(a)(iii), This is open ended. NRS 622.100 is detailed and complete. Supplemental reporting could be a costly burden to boards and their licensees.*

*Section 1(c), This is something that the Office (NBCCS) should prepare and provide to each of the boards. This should be deleted in its entirety.*

*Section 1(d)(i), Summary preparation of a report prepared by a board as required by statute is additional and un-necessary work to be borne by the boards.*

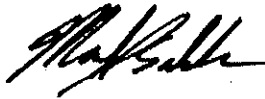
*Section 1(e)(ii & iii), This looks like something that the Office (NBCCS) could possibly do.*

*Section 1(f)(i & ii), NRS 625.425 - Certain records relating to investigation deemed confidential; certain records related to disciplinary action deemed public records dictate what we can and cannot share.*

There are additional edits in the R074-25 Proposed Regulation document (included with this letter)

We know this is long arduous process that requires time, hard work, and compromise. We are committed to this process and working with the Department of Business and Industry and the Office as we work together to draft regulations that best serve our great State and its citizens.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark J Fakler', written in a cursive style.

Mark J Fakler, PE  
Executive Director.

Nikki- for the proposed NAC 232 regulations dated by LCB on 11/5/2025 and the 11/25 workshop, some questions of mine on behalf of Optometry-

Section 1's intro says "but are not limited to:" What other reporting mandates are there going to be?

Section 1(c)(vi) regards proper reconciliation of board accounts and bank records. But those processes are undefined. My Board is provided all bank statements on a monthly basis, then we have an open meeting in June with a proposed budget for the upcoming FY. I would like to know what is meant by "proper reconciliation" so my Board doesn't run afoul of any of the Office's expectations or mandates.

Section 1(d)(ii)- this section doesn't say so like the others, but will this be "on a form provided by the Office"? Or is an email going to suffice?

Section 1(d)(xiii)- for the public postings of financial summaries and CPA audits, with there be any redactions allowed? Seems like sensitive financial information, typically kept in-house, now becomes available to the public without even a public records request for it.

Section 4(a)- these website updates might cost any given board thousands of dollars in I.T. fees. Is any stipend or supplemental funds coming from the Office? I see section 6(c) mentions the withholding of administrative or fiscal support services, which suggests that fiscal support would be provided to the board? Or are the boards still on their own for what I would classify as this unfunded mandate?

Section 5(b)- what if the Board contests or disagrees with the Office's required corrective actions? There is no mechanism allowed in the regulation for any Board to contest anything, which would seem to make the process even more expensive by needing judicial intervention.

Adam Schneider, Esq.

Executive Director

**Nevada State Board of Optometry**

**P.O. Box 1824**

**Carson City, NV 89702**

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**775-305-0105 - fax**

**[www.nvoptometry.org](http://www.nvoptometry.org)**

Joe Lombardo  
Governor

Benjamin S. Lurie, DC  
President  
Adam L. Ingles, DC  
Vice President  
Jason O. Jaeger, DC  
Secretary-Treasurer



Geoffrey D. Lowden, DC  
Member  
Christian L. Augustin, Esq.  
Consumer Member  
Reza R. Ayazi, Esq.  
Consumer Member  
Julie Strandberg  
Executive Director

## CHIROPRACTIC PHYSICIANS' BOARD OF NEVADA

4600 Kietzke Lane, M-245 | Reno, Nevada 89502-5000  
Phone: (775) 688-1921 | Fax: (775) 688-1920  
Website: <https://chirobd.nv.gov> | Email: [chirobd@chirobd.nv.gov](mailto:chirobd@chirobd.nv.gov)

November 13, 2025

Nikki Haag, Deputy Director  
Office of Nevada Boards, Commissions and Councils Standards  
1830 College Parkway, Suite 100  
Carson City, NV 89706

Dear Ms. Haag,

After careful review of the proposed regulations I would like to share my personal observations.

Please note, that the comments in this letter and in the attached document are my own and do not represent the position that the Chiropractic Physician's Board may have, since they have not had an opportunity to take a formal position at an open and public meeting.

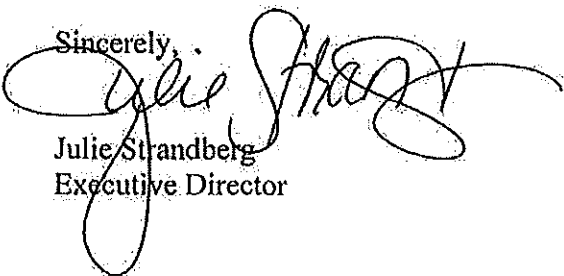
I appreciate the intent of the proposed regulations to enhance transparency and accountability. However, the reporting requirements outlined appear to duplicate information already submitted through existing processes or places unnecessary demands on Board staff. To promote efficiency and reduce administrative burden, I recommend streamlining or aligning these reporting requirements with current reporting mechanisms. This approach would maintain transparency while ensuring that resources remain focused on core regulatory and public protection functions.

Please refer to the attached document which identifies my comments to the respective sections.

Once you have received the version of the language from the Legislative Counsel Bureau please share that version with the Board and allow the Board at least 90 days for us to obtain a position and comments from the Board in an open and public meeting.

Thank you for considering my comments

Sincerely,

  
Julie Strandberg  
Executive Director

Joe Lombardo  
Governor

Benjamin S. Lurie, DC  
President  
Adam L. Ingles, DC  
Vice President  
Jason O. Jaeger, DC  
Secretary-Treasurer



Geoffrey D. Lowden, DC  
Member  
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Consumer Member  
Reza R. Ayazi, Esq.  
Consumer Member  
Julie Strandberg  
Executive Director

## CHIROPRACTIC PHYSICIANS' BOARD OF NEVADA

4600 Kietzke Lane, M-245 | Reno, Nevada 89502-5000

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November 13, 2025

Nikki Haag, Deputy Director  
Office of Nevada Boards, Commissions and Councils Standards  
1830 College Parkway, Suite 100  
Carson City, NV 89706

Dear Ms. Haag,

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Thank you for considering my comments

Sincerely,

  
Julie Strandberg  
Executive Director



# NEVADA ASSOCIATION OF LAND SURVEYORS

526 South E Street – Santa Rosa, CA 95404

T: (888) 994-3510 E: nals@nvlandsurveyors.org

November 12, 2025

Office of Nevada Boards, Commissions, and Councils Standards  
Department of Business and Industry  
1830 College Parkway, Suite 100  
Carson City, NV 89706

RE: Comments on Proposed Regulation – LCB File No. R074-25

Dear Director:

On behalf of the Nevada Association of Land Surveyors (NALS), we appreciate the opportunity to provide comments regarding the Proposed Regulation of the Department of Business and Industry Office of Nevada Boards, Commissions, and Councils Standards (Office) (LCB File No. R074-25).

NALS recognizes and supports the intent of this regulation to promote transparency, accountability, and consistent practices among Nevada's occupational licensing boards. However, we wish to express several concerns regarding the potential administrative, operational, and governance impacts on the Nevada Board of Professional Engineers and Land Surveyors (NVBPELS) and other Boards and Commissions.

#### **Increased Administrative and Reporting Burden**

The proposed regulation requires quarterly reporting on complaints, licensing data, financial summaries, and legislative tracking. These duplicative reporting requirements would significantly increase administrative workload and divert staff resources from essential regulatory and enforcement functions. NVBPELS already fulfills reporting obligations under NRS 622.

#### **Reduction of Board Autonomy**

While the regulation acknowledges each Board's fiscal independence, it grants the Office broad authority to issue corrective actions, require documentation of investigations, and recommend member removal. This undermines the independent, profession-driven governance structure that ensures public protection through technical expertise rather than political oversight.

#### **Overreach of Centralized Control**

The level of oversight proposed, particularly the ability to require additional data submissions and impose corrective timelines, appears to exceed the legislative intent of NRS 232.8415. For a specialized, self-funded Board such as NVBPELS, this could result in operational delays and the erosion of professional self-regulation.

#### **Financial and IT Impacts**

The required expansion of reporting will likely necessitate new software systems, staffing, and IT additions. These expenses could require an increase in licensee fees which would be an outcome contrary to efficient government operation.

NVBPELS has consistently demonstrated responsible self-governance, efficient operations, and strong public protection. We strongly believe that consistency and transparency can be achieved without compromising the independence or effectiveness of Nevada's professional licensing boards.

NALS opposes the proposed regulation – LCB File No. R074-25 and we respectfully urge the Office to, at minimum, consider revising the regulation to clarify limits of oversight and engage stakeholders in collaborative development of reporting standards.

Thank you for your commitment to responsible governance and public protection.

Respectfully submitted,

Nick Ariotti, PLS  
President



**STATE OF NEVADA**

**BOARD OF DISPENSING OPTICIANS**

4790 Caughlin Pkwy #241, Reno, NV 89519 • Telephone 775 / 433-1700 • Fax 775 / 433-1705

Email: [info@nvopticians.org](mailto:info@nvopticians.org) • Website: [www.nvbdo.nv.gov](http://www.nvbdo.nv.gov)

November 14, 2025

Ms. Nikki Haag, Deputy Director  
Office of Nevada Boards, Commissions, and Councils Standards  
Department of Business and Industry  
1830 E. College Pkwy, Suite 100  
Carson City, NV 89706

***Re: Proposed Regulation R074-25***

Dear Ms. Haag:

The Board of Dispensing Opticians appreciates the opportunity to submit written comments pertaining to Proposed Regulation R074-25, which is scheduled for a workshop on November 25, 2025. While we previously submitted notes to your office on October 10<sup>th</sup>, we were informed your office submitted an updated draft of the regulation to the Legislative Counsel Bureau, so we would like to update our comments and requests for revisions.

Our primary concern is that the current regulation does not adequately develop the underlying statutes, NRS 232.8413, and 232.8415, or reflect their intent. Specifically, it does not define or clarify the powers and duties of the Office of Nevada Boards, Commissions and Councils Standards, created under NRS 232.8413. There are only two general sections included in the regulation, "General Provisions", and "Department; powers and duties," and neither specifies, or even outlines, the structure of the department, the scope of its powers, or any of its responsibilities. The current draft primarily focuses on the responsibilities and operations of the boards and commissions under the purview of the Office, rather than defining the role of the Office itself. The regulation should clarify the scope of authority and the specific responsibilities of the Office to enable the implementation of its functions.

Additionally, the regulation does not define several key terms that are essential to understanding the Office's mandate. NRS 232.8415 lists the primary function of the Office as centralized administration, and tasks it with the creation of a uniform set of standards for investigations, licensing and discipline, internal controls, legal representation, and structural standards, as well as ensuring consumer protection, efficacy, and efficiency. However, "centralized administration" is not defined anywhere in the regulation, and there are no individual sections outlining specific standards or instructions for investigations, licensing and discipline, internal controls, legal representation, or structural standards. Likewise, "consumer protection," "efficacy," and "efficiency" are still vague, undefined terms. The regulation grants the Office the ability to audit the boards for performance, but does not list any of the standards by which they may be audited.

Another concern is that much of the language in the regulation recites already existing laws, and duplicates many of the boards' responsibilities related to data reporting. The regulation would require boards' staff to not only submit copies of any statutorily required reports to the Office, but also to include summaries of the reports, or restate the information in each report on Office-approved forms. These mandates will further burden the already overtaxed staff and monetary resources of many of the smaller boards. The regulation also mandates that the boards create their own searchable online databases for disciplinary actions, as well as keep copies of all statutorily required reports on their websites. Much of this information is currently supplied by the boards upon receipt of public records requests, however, maintaining all this information on a website will be burdensome and expensive.

In some instances, the regulation appears to create duties or powers not explicitly authorized by the statute, that are possibly beyond the scope of legislative intent. For example, boards are mandated to track bills during the legislative session, and to supply reports on their financial information to the Office, but there does not seem to be authority for this in the underlying statute. Likewise, the regulation states that boards that do not comply with the standards approved by the Office for efficacy and efficiency will be subject to discipline, including potential removal actions by the Governor's Office, or the withholding of administrative or fiscal support services. There is no statutory reference for these enforcement actions, and no mention of any administrative or fiscal support services anywhere else in the regulation, so it is unclear which services may be withheld.

To address these concerns, the Board of Dispensing Opticians respectfully suggests revisions to focus more directly on the powers, duties, and limitations of the Office itself. Additionally, providing clear definitions for the key terms used within the regulation would facilitate compliance, and ensure the Office's operations align with legislative intent of the underlying statutes.

Thank you for your time and consideration,

Jennifer Letten  
Board President

Corinne Sedran  
Executive Director

**PROPOSED REGULATION OF  
THE DEPARTMENT OF BUSINESS AND INDUSTRY - OFFICE OF NEVADA  
BOARDS, COMMISSIONS AND COUNCILS STANDARDS**

**LCB File No. R074-25**

November 5, 2025

EXPLANATION – Matter in *italics* is new; matter in brackets [~~omitted material~~] is material to be omitted.

**Disclaimer:** *Nothing in these regulations shall be construed to supersede or conflict with the procedural requirements set forth in NRS Chapters 622 or 622A, or with any current NRS or NAC applicable to boards governed under Title 54. These standards are intended solely to supplement existing statutory provisions for the purpose of administrative oversight, operational consistency, and inter-board standardization pursuant to NRS 232.8415.*

**General Provisions**

**NAC 232.010 Definitions. (NRS 233B.505) As used in NAC 232.010 to 232.140, inclusive, unless the context otherwise requires:**

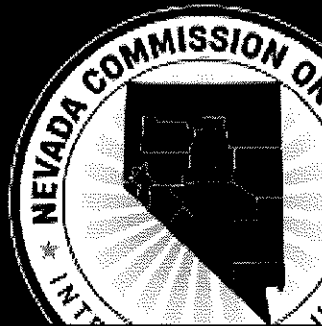
1. “Chief” means the chief of a division of the Department.
2. “Department” means the Department of Business and Industry.
3. “Director” means the Director of the Department.
4. *“Office” means the Office of Nevada Boards, Commissions, and Councils Standards.*
5. ~~“Board” means any board, commission, or other statutorily created entity under the purview of the Office pursuant to NRS 232.8415.~~
6. ~~“Board Member” means a person appointed to serve on a specific board.~~
7. ~~“Executive Director, or equivalent officer of the boards” means a person appointed or employed by a board who is responsible for overseeing the day-to-day operations of the board.~~
8. ~~“License” means any permit, registration, certificate, or license issued by a board under the Department.~~
9. ~~“Licensee” means any person who has been issued a permit, registration, certificate, or license by the board under the Department.~~
10. ~~“Profession” means any activity, occupation, or vocation regulated by a board under the Office of Nevada Boards, Commissions, and Councils Standards.~~
11. ~~“Purview” means the scope of authority, oversight and administrative responsibility assigned to the Office pursuant to NRS 232.8415, including oversight of the boards and commissions enumerated in NRS 232.8415(2).~~

**executivedirector@nvababoard.org**

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**From:** Ethics Link Nevada <ETHICSLINKNV@LISTSERV.STATE.NV.US> on behalf of Nevada Commission on Ethics - NO REPLY <000003241fe3082b-dmarc-request@LISTSERV.STATE.NV.US>  
**Sent:** Wednesday, April 29, 2026 1:56 PM  
**To:** ETHICSLINKNV@LISTSERV.STATE.NV.US  
**Subject:** Save Your Seat for 2026 Ethics Training - Ethics Link NV Quarterly Newsletter

Click [here](#) for the PDF of this issue of the Ethics Link NV Newsletter.



# Nevada Commission on Ethics

## Ethics Link NV Newsletter

April 29, 2026 – Issue 6 ([Archive](#))

**5 min read**

## Serving on Boards



### Catherine Zaranis, MA, NBC-HWC

Founder and Chief Executive Officer (CEO)

January 11, 2026

Serving on a board is often viewed as an honor. In practice, it is a form of stewardship, one that requires discipline, clarity, and a deep commitment to the mission. In an era of increasing complexity, scrutiny, and change, the quality of board governance can make or break an organization's ability to deliver on its purpose.

Whether you are stepping into your first board role or refining your approach after years of service, understanding why boards exist, and how to serve them well, is essential.

#### **Why Boards Exist**

At their core, boards exist to serve the mission of the organization. Not management. Not individual interests. Not legacy practices.

Boards are entrusted to:

- Provide fiduciary oversight and ensure legal, ethical, and financial integrity
- Safeguard mission, values, and long-term purpose
- Set and steward strategic direction
- Hire, support, and evaluate executive leadership
- Represent stakeholders, members, or the public interest

A strong board acts as a stabilizing force, especially during leadership transitions, periods of growth, or moments of external pressure. It holds the organization accountable to its purpose while creating the conditions for leadership to succeed.

### **What Decisions Boards Make (and don't)**

One of the most common challenges in governance is role confusion. High-functioning boards are clear about the decisions that belong at the board level, and those that do not.

Boards **are responsible** for decisions related to:

- Mission, vision, and strategic priorities
- Executive leadership selection, support, and evaluation
- Organizational policy and governance structures
- Budget approval and financial oversight
- Risk management, compliance, and reputation
- Major organizational shifts, partnerships, or investments

Boards **are not** responsible for:

- Day-to-day operations
- Staff supervision
- Program-level micromanagement
- Tactical execution

When boards drift into operational detail, they dilute their strategic value and undermine management. When they avoid fiduciary or strategic responsibility, they fail their duty of care. Effective boards operate at the *right altitude*, high enough to see the system, close enough to ask the right questions.

### **How Board Decisions Are Made**

The strength of board decisions depends less on individual expertise and more on **process, culture, and trust**.

Well-functioning boards:

- Rely on data and evidence, not anecdotes
- Encourage productive dissent and diverse perspectives

- Separate discussion from decision-making
- Use committees intentionally, not performatively
- Document decisions and the rationale behind them

Strong board chairs and committee leaders create space for thoughtful dialogue, manage dominant voices, and ensure quieter perspectives are heard. Psychological safety matters. Boards that can ask hard questions, without defensiveness, make better decisions over time.

### **The Impact of a Well-Functioning Board**

When boards function well, the impact is felt throughout the organization.

Effective boards:

- Strengthen executive leadership and accountability
- Create strategic clarity and continuity
- Anticipate risk rather than react to crises
- Increase trust with stakeholders and partners
- Align organizational culture with stated values

Perhaps most importantly, strong boards enable organizations to take the long view, resisting short-term fixes that compromise mission integrity in favor of sustainable impact.

### **Serving Well as a Board Member**

Board service is not about prestige. It is about contribution.

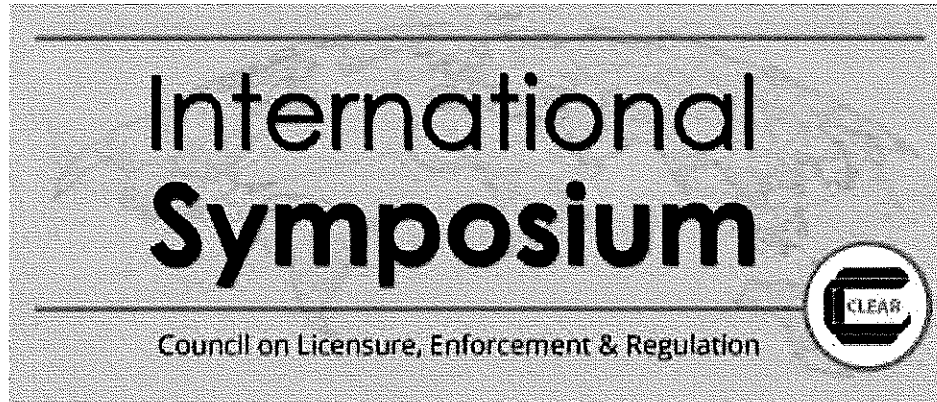
Effective board members:

- Prepare consistently and engage fully
- Ask thoughtful, system-level questions
- Acknowledge biases and manage conflicts of interest
- Stay focused on mission and outcomes
- Remember who, and what, they ultimately serve

Board service is one of the most powerful ways leaders can extend their impact beyond their formal roles. When done well, it strengthens institutions, protects missions, and creates the conditions for people and organizations to thrive.

If you are currently serving on a board: What's one question you could ask at your next meeting to strengthen board effectiveness? If you are considering board service: What will you look for to ensure the board operates with clarity and purpose?

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## **CLEAR's 2026 International Symposium Series**

📅 **Wednesday, May 27, 2026 at 12:00 PM (EDT) to Monday, November 16, 2026 at 2:00 PM (EDT)**

**[Register Now \(/events/2026-international-symposium-series/register\)](/events/2026-international-symposium-series/register)**

Menu



# CLEAR International Symposium Series

CLEAR's International Symposium returns in a new format as a year-round **Symposium Series**, creating expanded opportunities for global dialogue, shared learning, and engagement.

Unlike traditional webinars, this series is designed as a **discussion-driven forum**, bringing together regulators and system leaders from across jurisdictions and professions to explore complex, real-world challenges. Each session emphasizes comparative perspectives, practical insight, and meaningful exchange.

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## 2026 Theme: Regulation Without Borders

*Navigating Risk, Mobility, and Trust in a Global System*

Regulation is no longer confined by geography, yet accountability, public protection, and decision-making remain deeply local. As professionals and services move more freely across borders, regulators are increasingly navigating challenges that do not have simple or uniform answers.

This series will explore how regulatory systems are responding to these pressures, with a focus on the tensions, trade-offs, and emerging practices shaping global regulation today.

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## Who Should Attend

- Regulatory board and agency staff
  - Policy and legal professionals
  - Credentialing and licensure leaders
  - Anyone engaged in professional regulation or oversight
- 

## Why Attend

- Engage with global regulatory perspectives
  - Compare how different jurisdictions approach shared challenges
  - Participate in facilitated discussion, not just presentations
- 

**Attend one session or participate in the full series.**

## For More Information:



**Tora Stubberud-Dobbs, MBA**  
*Program Specialist*

Tiered Registration Pricing (<https://www.clearhq.org/clear-event-tiered-registration>) is available for this event. To request tiered pricing, reach out to Tora Stubberud-Dobbs. (<mailto:tstubberud@clearhq.org>)

## Contact

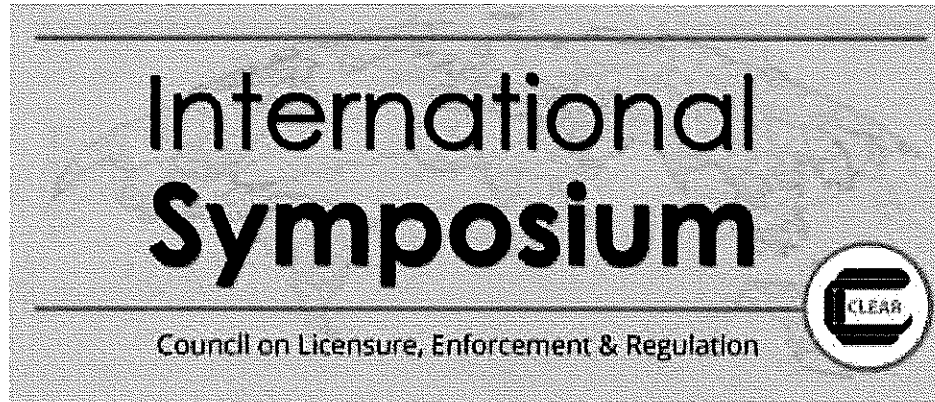
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Menu



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**All sessions are held virtually. Times listed in Eastern Time (ET).**

### **Session 1**

## **When Jurisdictions Collide: Accountability and Enforcement in a Borderless Regulatory Landscape**

May 27, 2026

12:00 - 2:00 PM

Duration: 120 - 150 minutes

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## **Session 2**

### **Recognition Without Borders: Rethinking Equivalency, Risk, and Trust in Global Licensure**

August 4, 2026\*

Exact time TBD

Duration: 120-150 minutes

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## **Session 3**

### **The Global Workforce Dilemma: Mobility, Sovereignty, and the Future of Professional Regulation**

November 16, 2026\*

Exact time TBD

Duration: 120-150 minutes

\*Please note this date is **tentative**. We will do our best to keep the date as is. Should it change, notice of the new date will be sent no later than 4 weeks prior to current listed date.