

Overview of Regulatory Revisions and Draft Progression

This document provides a comprehensive summary of revisions made to LCB File No. R074-25 across multiple draft iterations, including the Initial Draft, Proposed Draft, RP1, RP2, and RP3. It is intended to present a clear and transparent record of how the proposed regulation evolved in response to LCB review, legal review, public comment, stakeholder, and feedback.

The document is organized to show changes between each version of the regulation, identifying where language was added, removed, or clarified at each stage of the drafting process. It is intended to provide transparency into the regulatory process and demonstrate how stakeholder input was considered and incorporated where appropriate.

1. Summary of Regulatory Revisions Based on Public Comment, Stakeholder and Board Feedback on LCB File No. [R074-25I](#) and [R074-25P](#)

This document provides a summary of revisions made to LCB File No. R074-25 across multiple iterations of the regulation. It identifies where language was added, removed, or clarified during the regulatory process and reflects the evolution of the draft through successive versions.

Note on Section Numbering and Draft Progression:

The proposed regulation evolved through multiple draft iterations (Initial Draft, Proposed Draft, RP1, RP2, and RP3). Throughout this process, section numbering, organization, and structure were revised to improve clarity and alignment with statutory authority.

The comparisons below reflect alignment in subject matter and intent across drafts and may not correspond to identical section numbers in each version. Each revision reflects consideration of stakeholder feedback, legal review, and efforts to ensure consistency with NRS 232.8413 and NRS 232.8415.

Opening Paragraph / Regulatory Description

Summary of Changes:

This portion of the regulation was revised to remove references to earlier draft language and internal drafting artifacts and to present a formal regulatory description.

What Was Changed:

- References to the initial draft structure and internal drafting language were revised
- Language was restructured to reflect a finalized regulatory description

What Was Removed:

- References to “initial draft” R074-25I
- Wording tying the regulation to a previously “submitted board” draft
- Phrases referencing “agency submitted” or earlier draft framing
- Date reference “10/24/2025” tied to the earlier version
- Internal drafting artifacts and process-based language

What Was Added:

- Clean, formal regulatory description consistent with LCB drafting style
- Structured listing of subject matter, including
 - recordkeeping
 - board structure
 - training
 - internal controls
 - website requirements
 - legislative tracking
 - complaints and investigations
 - reporting to the Office
 - performance evaluations
 - enforcement provisions

Stakeholder Impact / Intent:

These changes provide a clear, formal description of the regulation’s scope and subject matter, removing internal drafting language and improving readability and consistency.

Legislative Counsel’s Digest

Summary of Changes:

This section was added to provide statutory context and summarize the purpose and structure of the regulation.

What Was Changed:

- No prior counterpart existed in the initial draft

What Was Removed:

- No substantive language was removed

What Was Added:

- A formal Legislative Counsel’s Digest
- Statutory authority references:
 - [NRS 232.8413](#)
 - [NRS 232.8415](#)
- Description of the Office’s responsibilities, including:
 - centralized administration
 - uniform standards (investigations, licensing, discipline, internal controls, legal representation)
 - structural standards for boards
 - transparency and consumer protection
 - efficacy and efficiency
- Structural overview of the regulation:
 - Sections 3–8 define key terms
 - Section 2 applies definitions
 - Section 9 interprets “purview”
- Clarification that Title 54 boards fall under the administrative purview of the Office

Stakeholder Impact / Intent:

This addition provides clear statutory context and improves understanding of how the regulation aligns with existing Nevada law.

Section 1 – Enabling / Structural Provision

Summary of Changes:

This section was added to formally establish the regulatory framework.

What Was Changed:

- No prior standalone provision existed in the initial draft

What Was Removed:

- No substantive language removed

What Was Added:

- Establishes that [Chapter 232 of NAC](#) is being amended
- Incorporates Sections 2 through 20 into regulation
- Clarifies that all sections are part of a unified regulatory framework

Stakeholder Impact / Intent:

This section provides the legal foundation for the regulation and formally establishes its structure.

Section 2 – Definitions Applicability / Core Terms

Summary of Changes:

This section was streamlined to simplify definitions and establish a clear framework for term usage.

What Was Changed:

- Definition structure simplified and reorganized

What Was Removed:

- Defined terms:
 - “Chief”
 - “Department”
 - “Director”
- Redundant or overly formal phrasing in the definition of “Office”
- Expanded definition language for “Purview” embedded in this section

What Was Added:

- Clarification that definitions in Sections 3–8 apply to Sections 2–20
- Simplified and focused terminology
- Structural rule governing how definitions apply

Stakeholder Impact / Intent:

These changes improve clarity and usability by removing unnecessary administrative definitions and establishing a clear framework for terminology.

Sections 3–8 – Definitions (Board, Board Member, Executive Director, License, Licensee, Office)**Summary of Changes:**

These sections were refined to remove redundancy, improve clarity, and align terminology.

What Was Changed:

- Definitions streamlined and simplified
- Wording refined for clarity and consistency

What Was Removed:

- Redundant phrasing and duplicative language
- References tying definitions to the Department
- Overly formal or unnecessary statutory references
- Incorrect definition of “Office” as a regulated activity

What Was Added:

- Clear, simplified definitions
- Correct definition of the Office as the administrative oversight entity
- Alignment across definitions for consistency

Stakeholder Impact / Intent:

These changes improve clarity, remove confusion, and ensure consistent interpretation of key terms throughout the regulation.

Section 9 – Interpretation of “Purview”**Summary of Changes:**

This section was added to clarify the meaning of “purview.”

What Was Changed:

- Interpretation of “purview” separated from definitions section

What Was Removed:

- Broader or implied interpretations suggesting:
 - operational control
 - direct authority over board functions

What Was Added:

- Explicit definition of “purview” as administrative oversight
- Clear limitation of the Office’s role to oversight only

Stakeholder Impact / Intent:

This section clarifies that the Office’s authority is limited to administrative oversight, addressing concerns regarding potential overreach.

Section 10 – Structural Standards / Governance / Operations

Summary of Changes:

This section was significantly reorganized to focus on governance and structural standards.

What Was Changed:

- Broad, consolidated framework broken into structured governance requirements

What Was Removed:

- Combined operational, financial, reporting, and investigative requirements previously grouped in one section
- Duplicative or overlapping language
- Broad operational mandates

What Was Added:

- Centralized recordkeeping requirements:
 - board seats
 - board members
 - term start and end dates
- Officer election requirements
- Attendance standards:
 - 3 consecutive unexcused absences
 - or 50% absence within 12 months
- Definition of “unexcused absence”
- Ability to recommend removal to the Governor

Stakeholder Impact / Intent:

These changes improve clarity and enforceability by separating governance standards from operational requirements and establishing clear expectations for board structure and participation.

Section 11 – Training Requirements

Summary of Changes:

This section was carried forward from the initial draft with minor refinements to clarify reporting requirements and maintain alignment with statutory training obligations.

What Was Changed:

- Maintained requirement for the Executive Director to notify board members of required training
- Maintained requirement for boards to notify the Office upon completion of training
- Clarified timing requirement for reporting completion of training

What Was Removed:

- No substantive requirements were removed from the initial draft.

What Was Added:

- Clarified reporting expectations to ensure consistent communication of training completion to the Office.

Stakeholder Impact / Intent:

These changes maintain existing training requirements while improving clarity and consistency in reporting obligations. The section continues to ensure compliance with [NRS 622.200](#) without introducing additional administrative burden.

Section 12 – Internal Controls / Compliance Standards

Summary of Changes:

This section was refined to organize internal control requirements into a structured framework while maintaining alignment with statutory audit and reporting obligations.

What Was Changed:

- Reorganized internal control provisions into clearly defined categories.
- Clarified requirements for financial management, recordkeeping, and audit compliance.

What Was Removed:

- Duplicative or overlapping procedural language
- Disorganized placement of internal control requirements within broader operational provisions.

What Was Added:

- Structured internal control requirements, including:
 - budget development and monitoring
 - maintenance of accurate and verifiable records
 - protection of confidential and personally identifiable information
- Continued requirement to respond to audit findings, including preparation of corrective action plans and submission of evidence demonstrating implementation of corrective actions
- Explicit alignment with statutory reporting and audit requirements, including [NRS 218G.400](#) and [NRS 622.100](#)

Stakeholder Impact / Intent:

These changes improve clarity and organization while maintaining required audit response and compliance obligations. The section continues to support financial accountability and transparency without introducing new substantive requirements.

Section 13 – Website and Public Transparency Requirements

Summary of Changes:

This section was significantly expanded and reorganized.

What Was Changed:

- Fragmented website requirements consolidated into a structured framework

What Was Removed:

- Duplicative and disorganized website language
- Redundant posting requirements
- Loosely defined transparency provisions

What Was Added:

- Comprehensive website requirements:

- ADA compliance
- board information
- meeting transparency
- licensing tools
- disciplinary systems
- complaint access
- financial transparency
- Structured organization of all requirements

Stakeholder Impact / Intent:

These changes improve transparency, accessibility, and consistency of public information across boards.

Section 14 – Legislative Tracking and Implementation

Summary of Changes:

This section was separated and clarified.

What Was Changed:

- Legislative tracking removed from broader operational framework

What Was Removed:

- Informal and disorganized legislative tracking language

What Was Added:

- Structured legislative tracking requirements:
 - tracking relevant bills
 - reporting within 60 days
 - implementation requirements
 - reporting format

Stakeholder Impact / Intent:

These changes create a clear, structured process for tracking and implementing legislative changes.

Section 15 – Public Outreach and Education

Summary of Changes:

This section was simplified and made permissive.

What Was Changed:

- Mandatory language revised

What Was Removed:

- Prescriptive outreach requirements

What Was Added:

- Optional outreach methods
- Clear purpose for outreach

Stakeholder Impact / Intent:

These changes reduce burden while still encouraging public communication.

Section 16 – Complaints and Investigations

Summary of Changes:

This section was clarified and structured.

What Was Changed:

- Investigation processes formalized

What Was Removed:

- Broad access language
- Unstructured complaint processes

What Was Added:

- Structured investigative process
- Documentation requirements
- Confidentiality limitations
- Legal boundaries for Office access

Stakeholder Impact / Intent:

These changes improve consistency, documentation, and legal compliance while protecting confidentiality.

Section 17 – Quarterly Reporting to the Office

Summary of Changes:

This section was standardized and aligned with statutory reporting requirements

What Was Changed:

- Reporting structure clarified and consolidated into a dedicated section

What Was Removed:

- Duplicative reporting requirements

What Was Added:

- Fixed reporting deadlines
- Alignment with [NRS 622.100](#)
- Complaint summary requirements, including complaints received, pending and resolved
- Requirement to report missed investigative deadlines and provide explanations
- Authority for the Office to request additional information

Stakeholder Impact / Intent:

These changes improve consistency and standardization of reporting requirements while ensuring the Office has sufficient information to carry out its oversight responsibilities.

Section 18 – Financial Reporting and Board Funds

Summary of Changes:

This section established a structured financial reporting framework and clarified the handling and control of board funds.

What Was Changed:

- Consolidated financial reporting requirements into a standalone section
- Established standardized timelines for annual and quarterly reporting
- Introduced simplified financial reporting formats for consistency

What Was Removed:

- Fragmented financial reporting provisions previously embedded in broader operational sections
- Redundant or duplicative reporting language

What Was Added:

- Requirement that all board funds must be deposited and used in accordance with applicable statutes

- Explicit clarification that the Office will not request or attempt to access, redirect, or use board funds
- Annual reporting requirement aligned with [NRS 218G.400](#)
- Quarterly and annual simplified financial reporting requirements
- Requirement to identify financial concerns and evaluate fee adequacy

Stakeholder Impact / Intent:

These changes improve financial transparency and reporting consistency while explicitly preserving board control over funds. The inclusion of language limiting the Office’s access to board funds addresses stakeholder concerns regarding financial independence and aligns with statutory authority.

Sections 19–21 – Performance Evaluations & Oversight Framework

Summary of Changes:

These sections established a structured oversight and enforcement framework for evaluating board performance and addressing noncompliance.

What Was Changed:

- Formalized the Office’s authority to evaluate board performance based on submitted reports and operational data
- Established a structured process for identifying deficiencies and requiring corrective action

What Was Removed:

- Informal or undefined oversight processes present in the initial draft

What Was Added:

- Authority for the Office to conduct performance evaluations using financial and operational reports
- Authority to issue recommendations or require corrective action to improve efficiency, reduce costs, or enhance consumer protection
- Requirement for boards to implement corrective actions within specified timeframes
- Enforcement mechanisms for noncompliance, including:
 - Written notice of deficiency
 - Increased administrative oversight
 - Referral to the Governor for removal under [NRS 232A.030](#)
 - Withholding of administrative fiscal support services

Stakeholder Impact / Intent:

These changes establish a formal oversight and enforcement structure to ensure compliance with regulatory requirements. The framework provides clear mechanisms for identifying and addressing deficiencies while reinforcing accountability and operational consistency across boards.

Final Takeaway – R074-25I to R074-25P

R074-25P represents a significant structural and policy refinement of the initial draft, transforming the regulation from a broad and highly consolidated framework into a structured, clearly organized, and statutorily aligned regulatory standard.

Key updates include:

- Separation of previously consolidated requirements into defined sections
- Clarification of the Office’s role as administrative oversight

- Establishment of governance and structural standards
- Creation of standalone sections for reporting, investigations, and legislative tracking
- Improved transparency and website requirements
- Alignment with existing statutory reporting requirements
- Development of a structured oversight and evaluation framework

2. Summary of Regulatory Revisions Based on Public Comment, Stakeholder and Board Feedback on LCB File No. [R074-25P](#) and [R074-25RP1](#)

This document provides a summary of revisions made to LCB File No. R074-25 across multiple iterations of the regulation. It identifies where language was added, removed, or clarified during the regulatory process and reflects the evolution of the draft through successive versions.

Sections 1–4 – No Changes

Summary

These sections remain unchanged, reflecting that the existing language was retained as written.

Section 5 – Definition of “Executive Director”

Summary of Changes:

A minor formatting revision was made to this section.

What Was Changed:

The term “director” was changed from capitalized to lowercase.

What Was Removed:

No substantive language was removed.

What Was Added:

No new language was added.

Stakeholder Impact / Intent:

This change reflects a formatting adjustment for consistency in terminology and does not alter the meaning or application of the definition.

Section 6 – No Changes

Stakeholder Impact / Intent:

This section remains unchanged, reflecting that the existing language was retained as written.

Section 7 – No Changes

Stakeholder Impact / Intent:

This section remains unchanged, reflecting that the existing language was retained as written.

Section 8 – Definition of “Office”

Summary of Changes:

This section was revised to clarify the placement of the Office within the Department.

What Was Changed:

The definition of “Office” was expanded.

What Was Removed:

No language was removed.

What Was Added:

The phrase “within the Department” was added to specify organizational alignment.

Stakeholder Impact / Intent:

This change provides additional clarity regarding where the Office resides administratively, ensuring better understanding of its structure and alignment within the Department.

Section 9 – 10 - Technical and Grammatical Revisions

Summary of Changes:

Minor grammatical and technical revisions were made to improve clarity, consistency, and tense usage across these sections.

What Was Changed:

- The word “purpose” was revised to “purposes.”
- The phrase “the term began and expires” was revised to “the term begins and expires”

What Was Removed:

- The singular form “purpose.”
- The past tense “began”

What Was Added:

- The plural form “purposes.”
- The present tense “begins”

Stakeholder Impact / Intent:

These changes improve grammatical accuracy, consistency, and clarity without altering the meaning, interpretation, or substantive requirements of the provisions.

Section 11 – Board Member Training Notification

Summary of Changes:

This section was revised to improve grammatical clarity and consistency.

What Was Changed:

- The term “Executive Director” was revised to “executive director.”
- The phrase “after completing” was revised to “after a board member completes.”
- The phrase “a board shall provide” was revised to “the board shall provide.”
- The phrase “a board member completed” was revised to “the board member completed.”

What Was Removed:

- Capitalization of “Executive Director.”
- The phrase “after completing.”
- The indefinite articles “a” in reference to the board and board member.

What Was Added:

- Lowercase “executive director.”
- Clarifying language “after a board member completes.”
- Definite article “the” for consistency when referencing the board and board member.

Stakeholder Impact / Intent:

These changes improve clarity, grammatical precision, and consistency in how roles and actions are described, without altering the substantive requirements of the section.

Section 12 – Internal Control Standards

Summary of Changes:

This section was revised to improve clarity, formatting, and grammatical consistency, and to refine internal control requirements.

What Was Changed:

- The word “purpose” was revised to “purposes.”
- The phrase “to ensure that” was simplified to “that ensures.”

- Numbering within the section was corrected and standardized (e.g., subsections renumbered for consistency).
- Minor formatting and readability adjustments were made throughout.

What Was Removed:

- The phrase “to ensure that.”
- Inconsistent or incorrect subsection numbering.

What Was Added:

- Clarified phrasing “that ensures the information is accurate, complete and verifiable.”
- Corrected and consistent subsection numbering.

Stakeholder Impact / Intent:

These changes improve readability, consistency, and structural clarity of the internal control requirements without altering the underlying obligations placed on boards. It reinforces consistency in audit response and reporting structure.

Section 13 – Board Website Requirements

Summary of Changes:

This section was revised to improve clarity, standardize terminology, and refine website content requirements to better align with statutory reporting and transparency expectations.

What Was Changed:

- The term “Executive Director” was revised to “executive director.”
- The term “Instructions” was revised to “Clear instructions.”
- Financial reporting terminology was revised to reference “simplified financial reports” consistent with Section 18
- References to audits were refined for clarity and consistency (e.g., “prepared” revised to “conducted”)
- Minor grammatical, formatting, and readability improvements were made throughout
- Subsection lettering and formatting were standardized

What Was Removed:

- Less precise language such as “Instructions.”
- Prior references to “financial summaries” that were not aligned with updated terminology
- Minor redundant and strikethrough language

What Was Added:

- Clarifying language such as “Clear instructions” for licensing processes.
- Updated references to “simplified financial reports” to align with revised financial reporting structure
- Expanded clarification regarding audit reports, including additional audit and review sources
- Additional clarity to ensure consistency with statutory reporting requirements

Stakeholder Impact / Intent:

These changes improve clarity, consistency, and usability of board website requirements while refining terminology to better align with statutory reporting standards and transparency expectations, without materially expanding the underlying obligations.

Section 14 – Legislative Tracking and Reporting

Summary of Changes:

This section was revised to clarify reporting requirements and improve consistency in terminology.

What Was Changed:

The phrase “on a form” was revised to “in a format.”

What Was Removed:

The term “form” in reference to submission method.

What Was Added:

The term “format” to allow greater flexibility in how reports are submitted.

Stakeholder Impact / Intent:

This change provides flexibility to boards in how required reports are submitted while maintaining the reporting requirement itself. This change shifts the requirement from a prescribed form to a more flexible format, allowing boards discretion in how reports are structured while maintaining required content.

Section 15 – Public Outreach and Education**Summary of Changes:**

This section was revised to improve terminology and grammatical consistency.

What Was Changed:

Minor grammatical and formatting adjustments were made to improve clarity and consistency

What Was Removed:

No substantive language was removed

What Was Added:

No new substantive language was added

Stakeholder Impact / Intent:

These changes improve clarity and readability without altering the ability of boards to provide outreach and education to the public.

Section 16 – Complaint Investigations**Summary of Changes:**

A minor grammatical revision was made to this section.

What Was Changed:

The word “deadlines” was revised to “deadline.”

What Was Removed:

The plural form “deadlines.”

What Was Added:

The singular form “deadline.”

Stakeholder Impact / Intent:

This change improves grammatical accuracy and clarity without altering the meaning or requirements of the section. Ensures consistency with singular phrasing used throughout the subsection when referring to investigative benchmarks.

Section 17 – Quarterly Reporting Requirements**Summary of Changes:**

This section was revised to improve clarity, flexibility, and eliminate redundancy.

What Was Changed:

- The phrase “on a form” was revised to “in a format.”
- Language allowing submission of a copy of the report to the Legislative Counsel Bureau was refined for clarity.
- The complaint summary language was streamlined to remove redundancy.
- Clarified alignment with statutory reporting requirements and refined complaint reporting language to improve consistency and reduce duplication.

What Was Removed:

- The term “form” in reference to submission method.
- Redundant phrasing “all complaints received, pending and resolved...” where it duplicated subsection (a).
- Minor unnecessary conjunctions (e.g., trailing “and”).

What Was Added:

- The term “format” to provide flexibility in reporting.
- Cleaner, more direct phrasing in the complaint reporting subsection.

Stakeholder Impact / Intent:

These changes provide boards with more flexibility in how reports are submitted while improving clarity, aligning reporting requirements with existing statutory obligations, and reducing duplication in how complaint and operational data are reported.

Section 18 – Financial Reporting and Board Funds**Summary of Changes:**

This section was revised to remove limiting language regarding the Office’s authority and to improve clarity and flexibility in financial reporting requirements.

What Was Changed:

- The phrase “in the form” was revised to “in a format.”
- Minor grammatical and readability improvements were made throughout.
- Terminology was refined (e.g., “prepared” revised to “conducted” in reference to audits).

What Was Removed:

- The sentence:
“The Office will not request or attempt to access, redirect or use any money of a board.”
- The term “form” in reference to submission method.
- Minor redundant or less precise phrasing.
- Removed explicit regulatory language regarding the Office from accessing, redirecting, or using board funds, with reliance placed on existing statutory authority

What Was Added:

- The term “format” to provide flexibility in how financial reports are submitted.
- Clarified language in audit and reconciliation provisions.

Stakeholder Impact / Intent:

This change removes an explicit limitation on the Office’s interaction with board funds, shifting the section to rely on statutory authority rather than express regulatory restriction.

This represents a substantive policy clarification rather than a purely technical revision.

While the explicit prohibition was removed, the requirement that board funds be managed in accordance with applicable statutes was retained.

Section 19 – 20 No Changes

Stakeholder Impact / Intent:

While no textual changes were made between these two drafts, these sections retain the enforcement and corrective action framework, which is subsequently revised in later drafts.

Final Takeaway R074-25P to R074-25RP1

R074-25RP1 reflects a transitional stage in the regulatory process that incorporates stakeholder feedback primarily through technical, structural, and clarifying revisions, while maintaining the overall framework of the prior draft.

Key updates include:

- Improved clarity, consistency, and formatting across multiple sections
- Increased flexibility in reporting requirements through the shift from “form” to “format”
- Refinement of terminology to better align with statutory language and reporting standards
- Streamlining of complaint and reporting provisions to reduce redundancy
- A substantive policy adjustment in financial provisions (Section 18) removing explicit limitations on the Office’s interaction with board funds and relying instead on statutory authority

3. Summary of Regulatory Revisions Based on Public Comment, Stakeholder and Board Feedback on LCB File No. [R074-25RP1](#) and [R074-25RP2](#)

This document summarizes revisions made between the Revised Proposed Regulation R074-25RP1 (RP1) and the Second Revised Proposed Regulation R074-25RP2 (RP2). It identifies where language was added, removed, or clarified to reflect legal review and alignment with statutory authority.

Sections 1–4 – No Substantive Changes

Stakeholder Impact / Intent:

These sections remain unchanged and continue to provide foundational definitions and applicability of the regulation.

Sections 5–10 – Definitions and Structure (Reorganized)

Summary of Changes:

This portion of the regulation was expanded and reorganized.

What Was Changed:

- Definitions expanded from Sections 3–8 → Sections 3–10
- “Purview” moved from interpretive section into a defined term
- Structural provisions renumbered and reorganized

What Was Added:

- New definition:
 - “Disciplinary action”

Stakeholder Impact / Intent:

These changes improve clarity and usability by consolidating key terms into defined sections and adding clarity around disciplinary actions for consistency across reporting and transparency provisions.

Section 11 – Structural Standards

Summary of Changes:

This section was reorganized and clarified to improve structure and accountability standards.

What Was Changed:

- Structural standards reorganized into clearer subsections
- Attendance requirement language clarified and strengthened

What Was Added:

- Clarification that both the board and the Office may recommend removal of a board member to the Governor for failure to meet attendance requirements pursuant to [NRS 232A.030](#)

Stakeholder Impact / Intent:

These changes improve clarity and accountability in board governance by ensuring consistent enforcement of attendance expectations and aligning removal procedures with statutory authority.

Section 12 – Training Requirements

Summary of Changes:

This section was revised to improve clarity and consistency.

What Was Changed:

- “when such training is offered” → “when such training will be offered”
- Added “successfully completes” training

What Was Added:

- Clarification of successful completion requirement
- Reporting now submitted “in a format prescribed by the Office”

Stakeholder Impact / Intent:

These changes improve clarity and standardization of training requirements and reporting expectations without altering the underlying obligation.

Section 13 – Internal Controls**Summary of Changes:**

This section was expanded and clarified to better align internal control requirements with statutory and regulatory obligations.

What Was Changed:

- Broader reference to applicable statutory and regulatory authority
- Clarified audit and reporting requirements to include governing statutes and applicable provisions of Title 54
- Audit response timeframe extended from 60 days to 90 days

What Was Added:

- Explicit inclusion of governing statutes and Title 54 applicability
- Clarification that audit and reporting requirements include those established by authorized state entities

Stakeholder Impact / Intent:

These changes improve clarity and alignment with statutory requirements while providing boards additional time to respond to audit findings and ensuring consistency across oversight and reporting obligations.

Section 14 – Website Requirements**Summary of Changes:**

This section was significantly expanded and refined.

What Was Changed:

- Website requirements reorganized and clarified

What Was Added:

- 5-year archive limitation for:
 - agendas and minutes
 - disciplinary records
- Requirement to provide older records upon request
- Updated financial reporting display requirements
- Updated references to statutory compliance

Stakeholder Impact / Intent:

These changes improve transparency while establishing reasonable limits on required public postings, balancing public access with administrative burden.

Section 15 – Legislative Tracking

Summary of Changes:

This section was refined for clarity.

What Was Changed:

- Clarified reporting structure:
 - “for each bill tracked”

Stakeholder Impact / Intent:

This change improves clarity in reporting expectations and ensures consistency in how legislative impacts are documented.

Section 16 – Public Outreach – No Changes**Stakeholder Impact / Intent:**

This section remains consistent and continues to allow boards flexibility in public communication.

Section 17 – Complaints and Investigations**Summary of Changes:**

This section was significantly revised and expanded to clarify investigative procedures, jurisdictional requirements, and confidentiality protections.

What Was Added:

- Requirement for boards to determine jurisdiction before initiating an investigation
- Expanded investigative documentation requirements
- Confidentiality protections, including:
 - Clarification that boards are not required to disclose information that is confidential, privileged, part of an active criminal investigation, or otherwise protected by law

What Was Changed:

- Investigative terminology revised from “probable cause” to “reasonable doubt”
- Clarified investigation steps and documentation requirements

Stakeholder Impact / Intent:

These changes strengthen procedural clarity and legal compliance by ensuring investigations are conducted within proper jurisdiction and with appropriate confidentiality protections. The revisions also reflect a substantive change in how investigative thresholds are described.

Section 18 – Reporting Requirements**Summary of Changes:**

This section was expanded and clarified.

What Was Changed:

- Strengthened connection to Section 17 documentation
- Added limitation to “any other information” requests, requiring that such requests be reasonably related to the administrative, fiscal, or investigative operations of the board

Stakeholder Impact / Intent:

These changes clarify reporting expectations while addressing stakeholder concerns regarding overly broad information requests. The revised language ensures that reporting requirements remain tied to the Office’s administrative oversight role and do not create open-ended reporting authority.

Section 19 – Financial Reporting

Summary of Changes:

This section was significantly restructured.

What Was Changed:

- Deadline changed:
 - December 15 → December 1
- Financial reporting split into:
 - annual report
 - quarterly updates

What Was Added:

- Requirement for annual summary form tied to financial reports submitted pursuant to [NRS 218G.400](#)
- More structured financial reporting categories

Stakeholder Impact / Intent:

These changes improve consistency with statutory deadlines and enhance clarity and structure of financial reporting requirements.

Sections 20–21 – Performance Evaluation & Oversight Framework

Summary of Changes:

This is the largest policy shift in the regulation.

What Was Removed:

- Enforcement-based framework:
 - corrective action mandates
 - notice of deficiency structure
 - escalation authority (increased oversight, withholding services)
-

What Was Added:

- 60-day board response period before final evaluation
 - Explicit limitation:
 - Office cannot direct financial or operational activities
 - Creation of Section 21:
 - recommendation-based oversight framework
 - Requirement for boards to respond to recommendations
 - Explicit limitation clarifying that nothing in the regulation authorizes the Office to direct the financial or operational activities of a board
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What Was Changed:

- Evaluation tied to:
 - administrative efficiency
 - transparency
 - statutory compliance
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Stakeholder Impact / Intent:

These changes replace an enforcement and corrective action model with a structured oversight framework based on evaluation, written recommendations, and board response. The revision

clarifies that the Office's role is administrative oversight rather than operational control, aligning the regulation with statutory authority under [NRS 232.8415](#). The addition of explicit statutory limitation language further clarifies that the Office's role is administrative oversight and does not include authority to direct the financial or operational activities of a board.

Final Takeaway RP1 to RP2

This version, RP2, represents the most significant policy refinement in the regulatory process. Unlike the prior revisions, which focused largely on structure, terminology, and clarification, RP2 makes substantive changes to address stakeholder concerns regarding the scope of the Office's authority, confidentiality, reporting burden, and corrective action.

Key improvements include:

- Removal of the prior enforcement-based framework, including corrective action mandates, deficiency notices, and escalation authority.
- Replacement of enforcement language with a recommendation-based oversight model.
- Addition of a 60-day board response period before completion of a performance evaluation.
- Clear language stating that the Office may not direct the financial or operational activities of a board or require corrective action beyond what is required by statute.
- Strengthened confidentiality protections for investigative materials, including privileged, confidential, criminal-investigation, or otherwise protected information.
- More precise limits on information requests by tying them to administrative, fiscal, or investigative operations.
- Improved financial reporting structure, including the December 1 deadline and clearer separation between annual reporting and quarterly updates.
- Added 5-year public posting limits for certain website materials, with older records available upon request.

4. Summary of Regulatory Revisions Based on Public Comment, Stakeholder and Board Feedback on LCB File No. [R074-25RP2](#) and [R074-25RP3](#)

This document summarizes revisions made between the Second Revised Proposed Regulation R074-25RP2 (RP2) and the Third Revised Proposed Regulation R074-25RP3 (RP3). It identifies where language was added, removed, or clarified to reflect stakeholder feedback, legal review, and final drafting refinements.

Sections 1–4 – No Substantive Changes

Stakeholder Impact / Intent:

These sections remain unchanged and continue to provide foundational definitions and applicability of the regulation.

Sections 5–10 – Definitions and Structure

Summary of Changes:

No substantive changes were made.

What Was Changed:

- Minor grammatical and formatting refinements only

Stakeholder Impact / Intent:

These sections remain consistent, maintaining previously established definitions and structural clarity.

Section 11 – Structural Standards

Summary of Changes:

No substantive changes were made.

What Was Changed:

- Minor wording refinement:
 - “a board shall elect...” → “the board shall elect...”

Stakeholder Impact / Intent:

This change improves grammatical clarity and consistency without altering the requirement.

Section 12 – Training Requirements – No Changes

Stakeholder Impact / Intent:

This section remains unchanged and continues to establish standardized training notification and reporting requirements.

Section 13 – Internal Controls

Summary of Changes:

This section was slightly refined for clarity and statutory alignment.

What Was Changed:

- Reordered and clarified statutory references within audit and reporting provisions

Stakeholder Impact / Intent:

These changes improve readability and consistency in statutory references without altering substantive requirements.

Section 14 – Website Requirements

Summary of Changes:

This section includes minor clarifications and one notable addition.

What Was Changed:

- Minor grammatical refinements (e.g., “for applying” language clarified)

What Was Added:

- Formal definition of “performance data” within the regulation to clarify the type of operational and compliance information that must be prepared by boards and made available on board websites

Stakeholder Impact / Intent:

These changes improve clarity regarding required website content and define expectations for performance-related data, enhancing transparency while maintaining existing requirements.

Section 15 – Legislative Tracking

Summary of Changes:

Minor clarifications were made.

What Was Changed:

- Clarified phrasing:
 - “introduced to the Legislature” → “introduced in the Legislature”
- Clarified implementation language:
 - “which a board is required to take action to implement”

Stakeholder Impact / Intent:

These changes improve grammatical precision and clarity in describing legislative tracking and implementation responsibilities.

Section 16 – Public Outreach – No Changes

Stakeholder Impact / Intent:

This section remains unchanged and continues to allow boards flexibility in public communication.

Section 17 – Complaints and Investigations

Summary of Changes:

This section was slightly revised.

What Was Changed:

- Minor grammatical refinement:
 - “filed with the board” → “filed with a board”
- Clarified phrasing regarding missed deadlines

What Was Removed:

- Standalone subsection explicitly requiring boards to provide investigative materials upon request, with remaining provisions relying on disclosure requirements as permitted by law

Stakeholder Impact / Intent:

These changes further limit ambiguity regarding confidentiality and reinforce that disclosure of investigative materials is governed strictly by applicable law, strengthening legal protections for boards.

Section 18 – Reporting Requirements

Summary of Changes:

This section was streamlined.

What Was Removed:

- Requirement to report:
 - missed investigative deadlines and explanations for those delays

What Was Changed:

- Simplified reporting requirements to focus on:
 - complaint summaries
 - statutorily required reporting

Stakeholder Impact / Intent:

These changes reduce administrative burden on boards by eliminating duplicative reporting requirements and focusing submissions on core statutory obligations.

Section 19 – Financial Reporting -

No substantive changes.

Stakeholder Impact / Intent:

This section remains consistent and continues to provide structured financial reporting requirements aligned with statutory obligations.

Sections 20–21 – Performance Evaluation & Oversight Framework

Summary of Changes:

No substantive changes were made.

What Was Changed:

- Minor wording refinements to improve consistency in regulatory language, including:
 - “will evaluate” → “shall evaluate”
 - “will provide” → “shall provide” (Section 21)
- Retained discretionary language where applicable, including the Office’s authority to issue recommendations

Stakeholder Impact / Intent:

These changes strengthen consistency in regulatory language while preserving the recommendation-based oversight framework established in RP2.

Final Takeaway RP2 to RP3

This version RP3 represents a final refinement stage of the regulation, focused on clarifying language, reducing administrative burden, and strengthening legal precision rather than introducing new policy changes.

Key updates include:

- Removal of certain reporting and investigative disclosure requirements to reduce duplication and administrative burden
- Additional clarification of confidentiality boundaries and reliance on existing law for disclosure of investigative materials
- Minor grammatical and structural refinements across multiple sections
- Addition of clarifying definitions (e.g., “performance data”) to improve transparency requirements
- Increased consistency in statutory references and regulatory language

Final Summary of Regulatory Revisions

The proposed regulation evolved through multiple draft iterations (Initial Draft, Proposed Draft, RP1, RP2, and RP3), reflecting ongoing review by the Legislative Counsel Bureau, legal review, public comment, and stakeholder feedback.

Early drafts established a broad framework for governance, reporting, and oversight of boards, including provisions related to performance evaluation and corrective action. These regulations were developed pursuant to the Office's statutory responsibilities under NRS 232.8413 and NRS 232.8415, which require the establishment of uniform standards and centralized administrative oversight of boards. Subsequent revisions refined this framework to improve clarity, consistency, and alignment with statutory authority.

The most significant changes occurred between RP1 and RP2, where the regulation shifted from an enforcement-based model to a structured oversight framework focused on evaluation, written recommendations, and board response. These revisions removed corrective action mandates and other enforcement mechanisms, clarified confidentiality protections, limited the scope of reporting requirements, and added explicit language confirming that the Office does not have authority to direct the financial or operational activities of a board.

The final revision, RP3, represents a refinement stage focused on clarifying language, reducing administrative burden, and improving consistency without introducing new policy changes.

Collectively, these revisions demonstrate a consistent effort to respond to stakeholder concerns, appropriately narrow the scope of the regulation, and ensure that all provisions remain within the Office's statutory authority. The final regulation establishes a uniform, transparent, and administratively focused framework that promotes accountability, consistency, and public confidence while preserving the autonomy and statutory authority of individual boards.