



**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)

May 4, 2026

Dr. Kristopher Sanchez, Director  
Department of Business and Industry  
Nikki Haag, Deputy Director  
Office of Nevada Boards, Commissions and Council Standards  
1830 College Parkway, Suite 100  
Carson City, NV 89706

**Re: Opposition to Adoption of R074-25**

Dear Director Sanchez and Deputy Director Haag:

The Board of Dispensing Opticians wishes to express its opposition to the adoption of Proposed Regulation R074-25 in its current form, and reiterate the following concerns that were submitted to the Office of Boards, Commissions, and Council Standards (Office) as written comments on 11/14/25 and 3/23/26:

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 the boards to expand their administrative functions, update their online systems, and perform additional reporting activities. For example, the regulation would duplicate many of the boards' preexisting data reporting requirements related to licensing, disciplinary actions, and financial audits. It also mandates the boards to 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. These new obligations will inevitably result in increased costs, including staffing, technology upgrades, and ongoing operational expenses.

Many of the licensing boards operate with limited budgets that are already stretched thin by their existing statutory responsibilities. Without additional resources, these new requirements could lead to delays and reduced services for the license holders and public. It is important that this financial burden not be absorbed solely by the licensing boards. The Office should take responsibility for identifying and securing the necessary funding to support the implementation of its proposed regulation. 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.

We are also concerned that the proposed regulation does not adequately develop its underlying statutes, NRS 232.8413, and 232.8415, which require the Office to adopt regulations and procedures to administer the responsibilities of the Office. Specifically, it does not outline the structure of the Office, define the scope of its powers, or delineate 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 roles of the Office itself.

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 is no outlining of 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 authorizes the Office to evaluate each board to assess "administrative efficiency, internal controls, transparency, and responsiveness to the public," but does not list any of the specific standards by which they will be evaluated.

To address these concerns, the Board of Dispensing Opticians respectfully requests that the Office take no further action on the proposed regulation until revisions are made to delineate the powers, duties, and limitations of the Office, to provide definitions for the key terms used within the statute and regulation, and to secure adequate funding for the licensing boards to implement the provisions of the regulation. These revisions 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



[www.alpine-strategies.com](http://www.alpine-strategies.com)

May 11, 2026

The Nevada Osteopathic Medical Association (NOMA), we write in opposition to LCB File No. R074-25 as currently drafted.

NOMA recognizes and supports the importance of state oversight and accountability for Nevada's boards and commissions. We believe that regulatory boards should operate transparently, responsibly, and in a manner that protects the public interest. However, while we support the concept of appropriate oversight, we have significant concerns regarding the process through which these proposed regulations have been developed.

Specifically, the process surrounding LCB File No. R074-25 has lacked sufficient transparency, stakeholder engagement, and communication with the boards, associations, and industries that will be directly impacted. Organizations and professional boards that have long demonstrated efficient and effective governance should have been meaningfully included in discussions prior to the drafting and advancement of these regulations.

The Nevada State Board of Osteopathic Medicine has consistently demonstrated that it is an efficiently run board that fulfills its statutory and regulatory responsibilities in a timely and professional manner. The board has maintained effective oversight of licensees, disciplinary processes, and administrative functions while remaining responsive to both practitioners and the public. We are concerned that the proposed regulations, as currently written, could create unnecessary administrative burdens and operational disruptions for boards that are already functioning effectively.

NOMA respectfully urges Business & Industry to not to adopt these regulations in their current form. Instead, we encourage a collaborative and transparent process that includes meaningful input from well-functioning boards, professional associations, and impacted industries. Thoughtful stakeholder engagement will help ensure that any future regulatory framework strengthens accountability while preserving operational efficiency and serving the best interests of Nevada patients, healthcare professionals, and the public.

We appreciate the opportunity to provide comments and stand ready to work collaboratively on policies and regulations that serve all stakeholders effectively.

Respectfully,

A handwritten signature in black ink that reads "E. Malin". The signature is fluid and cursive, with a large initial "E" and a long, sweeping underline.

Elliot Malin, Esq.

JOE LOMBARDO  
Governor

STATE OF NEVADA



DR. KRISTOPHER SANCHEZ  
*Director*

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

VICTORIA ERICKSON, LCSW  
*Executive Director*

DEPARTMENT OF BUSINESS AND INDUSTRY  
OFFICE OF NEVADA BOARDS, COMMISSIONS AND COUNCILS STANDARDS  
**BOARD OF EXAMINERS FOR SOCIAL WORKERS**

To: Kristopher Sanchez, Director, Business and Industry  
Nikki Haag, Deputy Director, Office of Nevada Boards, Commissions and Councils Standards

From: **Board of Examiners for Social Workers**  
Board President – Esther Langston, PhD, LCSW  
Board Vice-President – Linda Holland-Brown, LCSW

Date: April 23, 2026

**Re: Intent to Act Upon a Regulation LCB File No. R074-25**

This document serves to notice the Office of Nevada Boards, Commissions and Councils Standards (Office) of **concerns** regarding their attempt to take action on R074-25 (as revised in version R074-25RP3).

The Office has failed to consider the feedback that has been presented by the Occupational Boards at each of the opportunities that have been provided to do so. The draft, R074-25RP3, received after the Legislative Counsel Bureau (LCB) review reflected only a few of the requested changes. At this time, we are still left with feedback provided to the Office, repeatedly, that has been disregarded or ignored and with no explanation provided as to why.

As an example, there are six instances in the draft language where information requested by the Office must be submitted on "a form [or format] prescribed by the Office." As it stands with this draft language, each Occupational Board will be expected to reformat existing reports as provided to the required state entities or to their own Board, simply to match a format dictated by the Office. Perhaps one of the most obvious examples of this in the current proposed language in Section 19 (see highlighted below in yellow).

**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.*

It is very **reasonable** that the Office receives a copy of the Board's annual fiscal audit as submitted to the Legislative Auditor (Sec.19.2(a)). What is **unreasonable** is the Office then expecting the Board to repackage this information into yet another "format as prescribed by the Board" (Sec.19.2(b)(1)–(5)).

It is also **reasonable** that the Office receive quarterly fiscal reports that summarize the finances of the Board (Sec.19.3). What is **unreasonable** is the requirement that it again be repackaged in a "format prescribed by the Office."

Another area of concern that has not been acknowledged or addressed is in **Sec. 20** and **Sec. 21**.

**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.***
  - 1. 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.***
  - 2. 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.***

There are several concerns regarding these sections.

- The language does not require the Office to be transparent regarding the benchmarks that the Board will be measured against in advance of the performance evaluation (this is much like the months before the 2025 Legislature, when the Office requiring copious amount of data be submitted to the Office and the Boards were never made aware of how this data was used, if it was interpreted correctly, etc.);
- Based on past experiences, the Board will be required to resubmit and/or repackage information that has already been submitted to the Office;
- The Board will be asked to send random information that may only loosely connected to their evaluation, (e.g. last year, the Board was randomly requested to send an entire year's worth of invoices, almost 600 pages of scanning, for an unknown reason);
- The Office can make arbitrary decisions about what constitute an "issue" without first making the performance benchmarks available to the Boards;
- While the Board can respond to identified "issues," the Office is not required to modify its findings based on the response from the Board. So, if the Office is inaccurate in its evaluation, they are not required to correct it;
- The Office will then provide written recommendations to improve performance, etc. again without the Board being clear about what the original "measuring stick"

is. The Board is then required to respond and then the final steps, to conclude the performance evaluation, are not provided. There is no language in the draft language about what happens next, if there is an appeals process, where the information goes, etc.

While these two examples provide some detail as to concerns, everything that is identified here was said by this Board and in many cases, several Boards without any changes in the language. The additional staff and fiscal burdens created by this draft language have been completely overlooked. Occupational Boards, especially those with less than 10,000 licensees, do not have exhaustive financial resources to comply with the additional work that will be required. Occupational Boards are self-funded and do not have the financial luxury to have staff available to do the "extra work" that will be required by the Office in this draft language. Each data request takes away from our primary focus of protecting the public by the licensing of competent practitioners and overseeing the practice of individuals in our various disciplines.

In reviewing the process, when our Board goes into regulatory workshops to revise our NACs, we engage in an interactive process and can include discussion and clarification of proposed language. In the prior workshops hosted by Ms. Haag, there was no mechanism to ask any questions, and there were limits to how long we could speak (less than a minute). The meetings with Ms. Haag were in no way collaborative, and it is very clear that many of the recommendations and concerns expressed have been ignored.

At this time, the Board cannot endorse the language as presented in the current draft. We would welcome an opportunity to be at the table to engage in a collaborative process around R074-25RP3.



**NEVADA STATE BOARD OF ARCHITECTURE, INTERIOR DESIGN & RESIDENTIAL DESIGN**

2080 E. Flamingo Rd., Suite 120, Las Vegas, NV  
89119 (702) 486-7300 phone (702) 486-7304 fax  
E-mail: [nsbaidrd@nsbaidrd.nv.gov](mailto:nsbaidrd@nsbaidrd.nv.gov) Website: [nsbaidrd.org](http://nsbaidrd.org)

April 29, 2026

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

RE: LCB File No. R074-25

Dear Ms. Haag,

Thank you for the opportunity to submit public comments on the proposed draft LCB File No. R074-25. The Nevada State Board of Architecture, Interior Design and Residential Design (the "Board") supports good governance and the development of rules in support of NRS 232.8415 to provide administrative oversight of professional and occupational boards.

The Board reviewed the regulations and submits comments about several errors in the 3<sup>rd</sup> draft Proposed Regulation.

**Section 14.**

At Subsection 1, compliance with providing accessibility on the internet for persons who are visually impaired must be conditioned upon the State providing agencies and boards the technology to do so.

At Subsection (i) to Subsection 1, the phrase "disciplinary action" must be defined as official actions taken by the Board based upon an adjudication of wrongdoing or violation. The presumption of innocence must be protected.

At Subsection (k) to Subsection 1, delete this entire subsection as redundant to Section 17.1.

**Section 15.**

The requirement to track bills which "impact the operations of or (sic) licensees" needs to be amended to state "impact the licensing requirements of licensees." The jurisdiction of this Board is statutorily limited to determining professional qualification to safely offer licensed services to the public. The Board has no other business monitoring what may impact "operations of licensees."

**Section 17.**

As noted above, Section 14.1.(k) is redundant to Section 17.1. We recommend that subsection (k) be stricken from Section 14.1.

## Section 20 and 21.

In order to avoid exceeding the statutory authority granted to the Office and to protect the authority of the Board to determine the level of professional competence necessary to protect the public, these two sections should be amended to state as follows:

*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.~~ compile an administrative compliance report of each board's submission of reports pursuant to Sections 2 to 21 of this regulation.*

*2. If the Office identifies any ~~issues during a performance evaluation conducted~~ report submitted during the period covered by the report 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.~~ compilation required in Section 1.*

*3. After completing a performance ~~evaluation~~ report 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~~—14—  
LCB-Draft of Third Revised Proposed Regulation R074-25 compliance of the board, any non-compliance in the report compiled pursuant to Section 20.1, 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, or identify any reasons why the recommendations are impracticable.*

*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.*

The proposed regulation significantly expands the volume of reporting required of Board staff. If this regulation is adopted as proposed, the additional reporting may necessitate the Board hires an additional part-time or full-time staff member. As we do not currently know the full fiscal impact of this regulation, it may require fee increases to our registrants in the future.

We sincerely appreciate the opportunity to share our comments and concerns and are pleased to answer any questions.

Sincerely,

*Monica Harrison*  
Monica Harrison  
Executive Director

NEVADA STATE BOARD OF ARCHITECTURE  
INTERIOR DESIGN AND RESIDENTIAL DESIGN



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

6170 Mae Anne Ave., Suite 1, Reno, NV 89523  
(775) 746-9423 / Fax (775) 746-4105  
[www.nvrehs.org](http://www.nvrehs.org) Email [board@nvrehs.org](mailto:board@nvrehs.org)

---

April 21, 2026

Dr. Kristopher Sanchez, Director  
Department of Business and Industry  
Nikki Haag, Deputy Director  
Office of Nevada Boards, Commissions and Council Standards  
1830 College Parkway, Suite 100  
Carson City, NV 89706

Re: Opposition to Adoption of R074-05 and Request for Revision

Director Sanchez and Deputy Director Haag,

The Board of Environmental Health Specialists is **OPPOSED** to the adoption of proposed regulation R074-25 Third Revised Proposed Regulation as written.

The Board of Environmental Health Specialist requests that no action be taken until such time as further amendments and/or revisions submitted herewith, and any comments and testimony at the hearing can be considered.

The Board of Environmental Health Specialists requests that virtual or on-line access be provided, in addition to the physical locations, for the May 11, 2026 Public Hearing on R074-05, to allow remote participation and comments due to the importance and impact on Title 54 occupational and professional boards. The Nevada Open Meeting Law states a public hearing must afford interested parties ... a reasonable opportunity to submit data, views or arguments upon a proposed regulation.

Opposition is based upon the substantial administrative impact of new, expanded, and duplicative requirements **unilaterally applied** without regard for economic disparity related to, funding resources, staffing levels and expertise, scope and number of complaints and disciplinary actions and diversity of licensee base of each occupational and professional board under the purview of the Office. This disparity has been reiterated by multiple boards and individuals on multiple occasions both orally and in writing and concerns have not been addressed in the proposed regulation.

The Board of Environmental Health Specialists requests the addition of a new provision establishing a clear process for granting *waivers or variances from specific requirements in cases of demonstrated undue hardship or extenuating circumstances*. This is particularly critical for smaller boards with limited administrative capacity.

Additionally, the Board has concerns regarding implications of AGO Opinion No. 2026-03 in respect to Section 15 of the proposed regulation which broadly requires boards to track and report on “any bills introduced in a legislative session that may *impact the operations of or licensees regulated by the board*”. The analysis of and tracking of all bills, requires expertise in the legislative process. The AGO Opinion limits board legislative activities to those “germaine to their regulatory purpose”; bills that may *impact the operations of or licensees regulated by the board* is overly broad and may conflict with the AGO Opinion as being germane to a board’s regulatory purpose.

Further analysis and clarification of AGO 2026-03 should be considered prior to adopting the current language in Section 15. Alternatively, the proposed revision to Section 15 submitted for considerations removes tracking requirements and limits reporting on bills relevant to the board that became law.

The regulation R074-25 under consideration for adoption indicates no changes resulting from public and stakeholder input submitted orally or in writing at the Public Workshop. An explanation of the reason no changes were made has not been provided.

NRS 233B.064, NRS 241 Open Meeting Law and the Administrative Rulemaking Manual, Page 8, reference consideration of comments, and that a written report is required. The consideration statement/report must include the requested change, the response to the request and the reason why the change was made or rejected.

If the proposed regulation R074-05 as presented is adopted on or after May 11, 2026 without change, the Board of Environmental Health Specialists respectfully request a written report or statement of the principal reasons for and against the adoption of R074-25 to include your reasons for overruling the considerations urged against its adoption submitted by all the interested parties. This request is submitted pursuant to NRS 233B.064, paragraph 2, and the above stated authority.

Respectfully submitted for consideration in response to the Notice of Public Hearing and Intent to Act Upon a Regulation, LCB File No. R074-05 scheduled for May 11, 2026.



Brian Northam, Chair  
Board of Environmental Health Specialists



Amber English, Vice Chair  
Board of Environmental Health Specialists

Atch: LCB File No. R074-05 Proposed Additions and Revisions

**BOARD OF ENVIRONMENTAL HEALTH SPECIALISTS**

**PUBLIC HEARING – May 11, 2026**

**PROPOSED ADDITIONS AND REVISIONS**

**LCB FILE NO. R074-25**

*NEW SECTION. 1. The Office may waive all or part of the requirements of Sections 2 through 21 of this regulation if a Board:*

- a. Submits a written request for a waiver identifying the specific section or requirement; and*
  - b. Provides evidence satisfactory to the Office of an extenuating circumstance or undue hardship which would substantially impact the board's ability to comply with the requirement.*
- 2. Examples of extenuating circumstances or undue hardship may include, without limitation,*
- a. Financial hardship,*
  - b. Staff resource limitations,*
  - c. Licensee base and diversity of professions regulated, and*
  - d. Number of complaints or disciplinary actions.*
- 3. If a waiver is not granted, the Office may grant extra time for the board to fulfill any requirement that has not been completed.*

**Rationale:** New section which provides authority for Boards to request and the Office to waive specific requirements with justification.

Boards have continuously voiced concerns prior to and during the regulatory rule making process regarding unfunded mandates associated with expanded administrative duties, added reporting, financial implications for updates to on-line systems and websites and utilization of staff resources. The adoption of these regulations has a significant impact particularly on smaller boards.

By establishing a waiver process, the Department and the Office acknowledge the challenges faced by these Boards and provide, with justification, a waiver system under certain circumstances.

*NEW SECTION. The Office may request any other information that is related to the administrative oversight of the board and is necessary to monitor compliance and evaluate the performance of each board.*

**Rationale:** Replaces Sec. 18, paragraph 3; this new section clarifies the parameters of information requests without specifying due dates and pertains directly to the purview of the Office.

**Sec. 10.** *“Purview” means administrative oversight, including, without limitation, monitoring, reviewing, guiding, and evaluating board compliance and performance.*

**Rationale:** Clarity in definition of “Purview” to include scope of administrative oversight.

**Sec. 14. Paragraph 1. subparagraph (j)**

*(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; or*

*~~(2) Be searchable; made available upon request, or by a link or form accessible from the website;~~*

*(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*

*~~(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.~~*

**Rationale:** (j) Provides alternative means to provide access to history of disciplinary actions. Searchable data would require extensive modification of existing websites and database systems to implement and for small boards it is financially unjustifiable with little benefit due to limited number of disciplinary cases.

(l) Quarterly reporting to the Office provides the necessary oversight required by statute. Posting to the website has no benefit to the public or constituents. Audits & Balance Sheets are sufficient to inform the public and constituents of the financial status of the Board.

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~~ relevant to the board ~~and whether the bills that became law;~~

(b) The potential impact of each bill on ~~the board. 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~~ administrative 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.

Rational: AGO No. 2026-03 needs further clarification; this entire section should be removed until such clarification is obtained. Alternatively, the above revisions are being requested.

Tracking of all bills begins at the BDR stage and requires a commitment of time that has no relevant benefit to every Board. Of relevance is the implementation of any new applicable laws which were passed during a legislative session and became law. Requiring tracking and reporting of irrelevant information is not necessary or appropriate.

**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:*

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

**Rationale:** As stated, this paragraph limits the submittal of any other requested information to the specific dates listed. Replaced by New Proposed Section.

**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.*

*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.*

**Rationale:** Wording removed to clarify the information required is fiscal year total to date at the end of a fiscal quarter, as referenced in (a) to (c). As written, the update would include only the 3 months of that fiscal quarter.

**From:** John Glenn <jg5thgear@gmail.com>

**Sent on:** Monday, May 4, 2026 10:13:12 PM

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

**Subject:** Re: Written Public Comment — LCB File No. R074-25 (Hearing scheduled May 11, 2026)

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

Dear Deputy Director Haag and Members of the Office:

I submit this comment in my individual capacity as a Nevada off-highway vehicle dealer and citizen of Elko, Nevada. I currently serve in the OHV dealer seat on the Nevada Commission on Off-Highway Vehicles. This comment is my own and is not submitted on behalf of the Commission, which has not considered this rulemaking at a public meeting.

Thank you for the opportunity to comment on R074-25. I support three aspects of the proposed regulation and respectfully ask that they be preserved in any final adopted text.

Section 3 appropriately limits the definition of “Board” to professional and occupational licensing bodies.

Section 3 defines “Board” as any professional or occupational licensing body, including, without limitation, a board, commission or council, that has been created by the Legislature and is under the purview of the Office. That definition appears consistent with the statutory scope of NRS 232.8413 and 232.8415, which address the Office’s duties relating to professional and occupational licensing boards. I support retaining this definition without expansion. In my reading, bodies created for purposes unrelated to professional or occupational licensing, including commissions within the Department of Conservation and Natural Resources operating under NRS 232.1585 and NRS Chapter 490, fall outside that definition, and I respectfully ask the Office to confirm that R074-25 is not intended to be interpreted to reach such bodies.

Section 20(4) properly preserves the line between oversight and direction.

Section 20(4) provides: “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.” I support retaining this language without modification. It is consistent with the longstanding Nevada principle that boards and commissions possess and exercise only the authority granted by statute, and that regulations must remain within statutory bounds.

R074-25 should be interpreted consistently with the statutory scope the Legislature left in place.

During the 2025 session, SB78 (BDR 18-301) proposed broad revisions to the powers and duties of the Office and to the composition and operation of various boards, commissions, councils and similar bodies. That bill did not pass. I respectfully ask the Office to note, either at adoption or in any concise statement issued under NRS 233B.064(2), that R074-25 is intended to operate only within the bounds of NRS 232.8413 and 232.8415 as currently enacted, and that nothing in R074-25 is intended to expand the universe of bodies under the Office’s purview.

Thank you for the opportunity to comment.

Respectfully,

--

John Glenn  
5th Gear Powersports  
420 30th st  
Elko, Nv. 89801  
775-777-3373