

## **1. Public Comment – LCB R074-25 (General)**

### **Nevada Association of Land Surveyors**

*Nick Ariotti, President*

- Raises broad concerns regarding the overall scope and reach of the proposed regulation, particularly as it relates to expanded reporting and oversight requirements.
- Questions whether several key concepts, such as reconciliation standards, reporting formats, and performance measures are sufficiently defined to allow boards to comply consistently and in good faith.
- Expresses concern that the regulation may require public posting of sensitive financial information without clear guidance on redactions, potentially exposing confidential or internal fiscal details beyond what is necessary for transparency.
- Highlights anticipated costs associated with new website functionality, data management systems, and IT services, noting that these expenses may disproportionately affect smaller or self-funded boards.
- Raises the issue of whether the regulation effectively creates unfunded mandates by imposing additional administrative and technical obligations without accompanying resources or support.
- Seeks clarification regarding procedural safeguards, including whether and how boards may contest, respond to, or appeal corrective actions or findings issued by the Office.

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## **2. Public Comment – LCB R074-25**

### **Nevada State Board of Dental Examiners**

*A.L. Higginbotham, Executive Director*

- Identifies several operational and practical concerns related to implementation of the proposed regulation, particularly with respect to historical records and disciplinary data.
- Requests reasonable time limitations on retroactive requirements, including digitization of meeting minutes and disciplinary records, citing the burden of converting decades-old, non-searchable materials.
- Seeks clarification of the term “disciplinary actions,” noting that the regulation does not distinguish between informal resolutions, probationary actions, and formal sanctions such as suspension or revocation.

- Questions whether reporting requirements should be limited to active licenses, or active licenses plus recent disciplinary history, rather than requiring comprehensive historical reporting.
- Raises concerns about retrospective disclosure of disciplinary records that may have been subject to confidentiality provisions at the time they were created.
- Requests modification of investigative language to reflect jurisdictional screening processes already required under existing board regulations.
- Notes inconsistencies in corrective-action timelines and requests standardization to ensure predictability and fairness.

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### **3. Public Comment – LCB R074-25**

#### **Nevada Board of Dispensing Opticians**

*Jennifer Letten, Board President; Corinne Sedran, Executive Director*

- Raises concern that the proposed regulation places extensive administrative and reporting obligations on boards while failing to clearly define the powers, duties, and limits of authority of the Office, despite expanding its oversight role.
- Notes that key statutory concepts referenced in the regulation, including centralized administration, consumer protection, efficacy, and efficiency are not defined, creating uncertainty regarding expectations and compliance standards.
- Objects to duplicative reporting requirements that restate existing statutory obligations while also requiring additional summaries, reformatted submissions, and Office-specific reporting formats.
- Highlights the administrative burden and financial impact of requirements to maintain searchable online disciplinary databases and extensive website archives, particularly for boards with limited staff and resources.
- Questions the statutory basis for enforcement mechanisms such as corrective actions, enhanced oversight, referrals for removal, and the withholding of administrative or fiscal support services.
- Recommends that the regulation be revised to focus on clearly defining the Office's role and responsibilities rather than expanding board-level administrative obligations.

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### **4. Public Comment – LCB R074-25**

## **Nevada State Board of Nursing**

*Cathy Dinauer, MSN, RN, Executive Director*

- Questions the necessity of regulation to require submission of reports already mandated by statute and submitted to other state entities.
- Suggests that if consolidated reporting is needed, the Office could obtain such information directly from existing agencies rather than requiring duplicative submissions from individual boards.
- Raises significant concerns regarding confidentiality of investigative information and whether a regulation may override statutory confidentiality protections.
- Questions why compliance with the Nevada Open Meeting Law must be reiterated in regulation when already required by statute.
- Objects to potential future cost-allocation requirements that would require boards to fund Office operations without clear statutory authority.

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## **5. Public Comment – LCB R074-25**

### **Nevada State Board of Optometry**

*Adam Schneider, Esq., Executive Director*

- Identifies multiple instances of open-ended or undefined language that could permit future expansion of reporting obligations without additional rulemaking.
- Requests clarification of what constitutes “proper reconciliation” of financial accounts to avoid inadvertent noncompliance.
- Raises concerns regarding public posting of audits and financial summaries and whether sensitive information may be redacted.
- Questions whether boards will receive financial or technical assistance to comply with costly website and IT mandates.
- Notes the absence of any mechanism for boards to contest or appeal corrective actions imposed by the Office, potentially forcing disputes into litigation.

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## **6. Public Comment – LCB R074-25**

### **Nevada State Board of Physical Therapy**

*Michael S. Laymon, PT, DPT, DSc., Ph.D., OCS, Board Chair*

- Highlights national recognition for regulatory excellence and asserts that the Board already meets or exceeds best practices for licensing, investigations, and transparency.
- Argues that duplicative reporting and new administrative requirements would divert staff time away from public protection functions.
- Expresses concern that the regulation adopts a punitive enforcement model that fails to account for delays outside board control.
- Warns that erosion of board autonomy in other jurisdictions has resulted in slower regulatory response and increased public harm.
- Concludes that the regulation is unnecessary and counterproductive for high-performing boards.

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## **7. Public Comment – LCB R074-25**

### **Chiropractic Physicians' Board of Nevada**

*Julie Strandberg, Executive Director*

- Submits preliminary observations noting that the comments reflect staff perspective rather than a formal board position.
- Acknowledges the intent of transparency and accountability but cautions that reporting requirements duplicate existing processes.
- Recommends aligning new requirements with existing reporting mechanisms to avoid unnecessary administrative burden.
- Requests receipt of the next LCB draft and adequate time for the Board to deliberate in a public meeting before taking an official position.

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## **8. Public Comment – LCB R074-25**

### **Nevada Chapter of the American Council of Engineering Companies**

*Dawn Miller, Executive Director*

- Supports efforts to improve efficiency and transparency but cautions against applying uniform oversight to boards that are already operating effectively.
- Emphasizes that regulatory authority should not be expanded through undefined standards or internal procedures developed outside the public regulatory process.
- Stresses the importance of flexibility to avoid impeding boards that perform critical public safety functions.

## **9. Nevada State Board of Accountancy**

### **Nevada State Board of Accountancy**

*Viki Windfeldt, Executive Director*

- Requests clarification regarding the scope of the Office's oversight authority under NRS 232.8415, noting that the regulation appears to extend beyond administrative coordination into substantive board operations.
- Raises concern that website and archival requirements could require digitization and posting of records spanning multiple decades, creating substantial administrative and financial burdens.
- Requests reasonable time limits on the publication of disciplinary history, financial records, and historical materials to ensure feasibility.
- Notes that compliance may require new software systems, additional staff time, or outside contractors, increasing operational costs.
- Raises confidentiality and privilege concerns related to investigative files, particularly where disclosure obligations may conflict with existing statutes.
- States that enforcement and audit provisions appear to permit corrective actions and oversight without clearly defined standards, processes, or due-process protections.

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## **10. Nevada State Board of Architecture (NSBA)**

### **Nevada State Board of Architecture**

*Board Representatives*

- Expresses concern that expanded reporting and oversight obligations may exceed the authority granted under existing statutes.
- Emphasizes that self-funded professional boards already operate efficiently under established statutory frameworks.
- Warns that additional administrative requirements could divert limited staff and financial resources away from core licensing, enforcement, and public protection functions.
- Requests clear notice of final regulatory language, adequate opportunity for board review, and sufficient time to agendize and evaluate substantive changes prior to adoption.

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## **11. Nevada State Board of Environmental Health Specialists**

### **Nevada Board of Environmental Health Specialists**

*Loretta L. Ponton, Executive Director*

*Date: October 10, 2025*

- States that the Board did not have sufficient time to convene a public meeting prior to the written comment deadline and therefore did not adopt a formal board position.
- Submits comments as an interested party with extensive experience in board administration.
- Identifies a lack of clarity regarding the duties of the Office, particularly the meaning and scope of “centralized administration.”

Requests clearer delineation of the Office’s role, including responsibilities related to:

- Oversight of administrative compliance
- Coordination with other state agencies
- Facilitation of board access to state systems
- Communication of administrative directives and statutory updates
- Monitoring compliance with administrative standards

Emphasizes that ongoing dialogue between boards and the Office is essential to promote transparency, consistency, and trust.

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## **12. Nevada State Board of Nursing (Additional Submission – Workshop Focus)**

### **Nevada State Board of Nursing**

*Board Counsel / Representatives*

*Date: November 2025*

- States that several provisions duplicate existing statutory requirements governing investigations, reporting, and disciplinary procedures.
- Objects to mandatory investigative language that does not adequately account for lack of board jurisdiction in certain matters.
- Raises concern regarding the use of criminal-law terminology such as “probable cause,” which may not align with administrative enforcement frameworks.

- Warns that certain reporting metrics could inaccurately reflect board performance and create misleading impressions.
- Expresses concern that vague standards such as “fair and responsive” may increase litigation risk.
- Requests narrowing of regulatory language to avoid conflict with existing statutes and administrative procedures.

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### **13. Nevada Optometry / Dispensing Professions (Additional Stakeholder Submission)**

#### **Nevada State Board of Optometry**

*Professional Board or Association*

- Objects to the breadth of centralized administrative requirements imposed by the regulation.
- Raises concerns regarding mandatory reporting, website publication mandates, and investigative documentation requirements that duplicate existing obligations.
- Identifies cost burdens associated with compliance, particularly for IT infrastructure and data management.
- Notes lack of clarity regarding the Office’s authority and enforcement standards.
- Urges restraint and closer alignment with statutory authority.

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### **14. Opposition to Proposed Board Regulations of B&I (General Stakeholder Group)**

#### **Professional Stakeholder Group**

*Date: November 2025*

- Expresses broad opposition to the proposed regulations.
- Asserts that the regulations impose unnecessary administrative burdens without corresponding public benefit.
- States that the regulations expand oversight beyond statutory authority and risk undermining board independence.
- Highlights concerns regarding increased costs, duplicative reporting, and expansive enforcement mechanisms.
- Characterizes the regulation as overly prescriptive and insufficiently tailored to the diversity of boards under its scope.

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**15. Proposed Regulation of the Department of Business and Industry – Office of Nevada Boards, Commissions, and Councils Standards (Annotated Draft)**

**Nevada Department of Business and Industry**

*Submitted by: Unknown (regulatory markup document)*

*Date: November 5, 2025*

Provides an annotated version of the proposed regulation reflecting additions, deletions, and revisions for stakeholder review.

Includes provisions addressing:

- Definitions
- Reporting and performance metrics
- Investigative standards
- Legislative bill tracking
- Financial reporting and audits
- Training requirements
- Website transparency mandates
- Performance evaluations
- Enforcement mechanisms

Reflects a broad framework for centralized administrative oversight, including quarterly and annual reporting, investigative documentation, audit response obligations, and potential corrective actions or referrals for noncompliance.

Serves as a reference document for public and stakeholder review rather than independent commentary.