



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 • Website: 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