

NEVADA STATE BOARD OF MEDICAL EXAMINERS

9600 Gateway Drive
Reno, NV 89521

Nick M. Spirtos, M.D., F.A.C.O.G.
Board President

Edward O. Cousineau, J.D.
Executive Director



Informational Statement LCB File No. R055-25

The following statement is submitted for adopted amendments to Nevada Administrative Code (NAC) Chapter 630.

1. A Clear and Concise Explanation of the Need for the Adopted Regulation.

The proposed regulations are necessary to implement SB189 from the 2025 Legislative Session regarding the licensing of genetic counselors in the State of Nevada. The proposed regulations add requirements for genetic counselors regarding licensure applications and disciplinary matters to NAC Chapter 630 and sets out documentation and other requirements that are necessary for public safety. The proposed regulations add genetic counselors to relevant existing NAC Chapter 630 provisions.

2. A Description of How Public Comment Was Solicited, a Summary of Public Response, and an Explanation How Other Interested Persons May Obtain a Copy of the Summary.

The Board solicited comments from any potentially impacted businesses by reaching out to various business chambers and associations. Copies of the Board's proposed regulation draft were sent to the following organizations on September 26, 2025:

- Better Business Bureau of Northern Nevada, Inc.
- Better Business Bureau of Southern Nevada, Inc.
- Churchill County Economic Development Authority
- City of Winnemucca
- Clark County Medical Society
- Elko Great Basin College
- Ely Rural Nevada Development Corp.
- Las Vegas Asian Chamber of Commerce
- Las Vegas Latin Chamber of Commerce
- Las Vegas Metro Chamber of Commerce
- Nevada State Medical Association
- Pahrump Rural Nevada Development Corp.
- Reno/Sparks Chamber of Commerce
- Washoe County Medical Society

Copies of the Board's regulation draft, workshop notices, and a copy of the Board's preliminary Small Business Impact Statement were sent by U.S. mail and emailed to persons who were known to have an interest in the subject of medical regulation, as well as any persons who had specifically requested such notice. These documents were also made available on the website of the Nevada State

Board of Medical Examiners, available at http://medboard.nv.gov/About/Proposed_Regulations/, and the website of the Legislative Counsel Bureau, available at <https://www.leg.state.nv.us/App/Notice/A/>.

Copies of the Board's Notice of Intent to Act Upon a Regulation, the proposed regulation draft, and the Board's preliminary Small Business Impact Statement were sent by U.S. mail and emailed to persons who were known to have an interest in the subject of medical regulation, as well as any persons who had specifically requested such notice. These documents were also made available on the website of the Nevada State Board of Medical Examiners, available at http://medboard.nv.gov/About/Proposed_Regulations/, and the website of the Legislative Counsel Bureau, available at <https://www.leg.state.nv.us/App/Notice/A/>.

In the Notice of Intent to Act Upon a Regulation, the public was notified that a copy of the proposed regulation was on file at the Nevada State Library, 100 N. Stewart St., Carson City, Nevada; available at the offices of the Board located at 9600 Gateway Drive, Reno, Nevada and 325 E. Warm Springs Road, Suite 225, Las Vegas, Nevada; in the State of Nevada Register of Administrative Regulations which is prepared and published monthly by the Legislative Counsel Bureau pursuant to NRS 233B.0653; and on the Internet at <https://www.leg.state.nv.us/register/>, as well as posted at the following locations:

State Library, Archives and Public Records - Carson City, NV

Nevada State Board of Medical Examiners - Reno, NV

Nevada State Board of Medical Examiners - Las Vegas, NV

Nevada State Board of Medical Examiners Website - <https://medboard.nv.gov/>

No public comment was received at the regulation workshops, public hearing, or Board meeting on January 29, 2026, wherein the Board adopted the regulations, indicating that the Board's proposed regulations would have a direct and significant economic burden upon a small business or directly restrict the formation, operation, or expansion of a small business. At the regulation workshops held on October 28, 2025, and November 17, 2025, and the public hearing held on January 16, 2026, stakeholders, potential license applicants, and members of the public were invited to attend, ask questions about the regulations, and provide public comment regarding the regulations. Multiple individuals attended those meetings, and all the comments that they provided were in support of the Board's proposed regulations, asked questions about provisions contained in the Board's proposed regulations, and suggested potential changes to the Board's proposed regulations for clarity or to better reflect what might work best in the practice setting or better assist new licensees. All the questions asked by members of the public, stakeholders, and potential license applicants were later answered in the public meetings held on these regulations. No public comment was received at the January 29, 2026 Board meeting, wherein the Board adopted the regulations with three changes. However, the Board carefully considered the public comment received prior to voting to adopt the regulation with changes.

The Board received an email Weldon Havins, M.D., on October 15, 2025. The Board received a letter from the Genetic Counselors Association of Nevada, on October 21, 2025. The Board received a letter from Cure 4 The Kids Foundation on October 27, 2025. The Board received a letter from Nevada Rare Disease Advisory Council, on October 28, 2025. The Board received an email from Ashley Smith signed by Michael Stephen Skylor Smith, on January 13, 2026. The Board received an email from Julia Prinzi on January 7, 2026. None of these emails or letters indicated that the proposed regulation would

have a direct and significant economic burden upon a small business or directly restrict the formation, operation, or expansion of a small business.

A summary of the public comment received regarding LCB File No. R055-25 is available upon request by contacting Deputy Executive Director Bradley at bradleys@medboard.nv.gov or by telephone at 775-324-9365.

3. The Number of Persons Who:

(a) Attended Each Hearing:

October 28, 2025 (Regulation Workshop): 8;
November 17, 2025 (Regulation Workshop): 5;
January 16, 2026 (Public Hearing): 2.

(b) Testified at Each Hearing:

October 28, 2025 (Regulation Workshop): 6;
November 2, 2023 (Regulation Workshop): 4;
January 16, 2026 (Public Hearing): 1.

(c) Submitted to the Agency Written Comments:

The Board received an email Weldon Havins, M.D., on October 15, 2025. Dr. Havins asked how the Board will determine whether an applicant for licensure as a genetic counselor communicates adequately orally or in writing in the English language. Board staff responded indicating that this language in Section 2(1)(b) in the regulation draft is the same as that for physician assistants, elsewhere in NAC Chapter 630. With regard to physician assistants, there has not been an issue with the use of this language or determining an applicant's English language skill. In addition, at the public hearing held on January 16, 2026, this public comment was discussed and Dr. Nunes indicated that passing of the examinations, which are given in English and required to obtain certification as a genetic counselor should adequately ensure that applicants are able to communicate adequately in English.

The Board received a letter from the Genetic Counselors Association of Nevada, on October 21, 2025. This letter was in support of the regulations and suggested several changes to the regulations. First, the Association suggested that the reinstatement fee contained in Section 10 of the regulations be reduced. The Association requested that competency assessment requirement after a genetic counselor has been out of practice for 24 months or more as contained in the original regulation draft be changed to allow other options than just an examination. This change was accepted and is reflected in Section 2 of the proposed regulation draft. The Association suggested a change to the original regulation draft regarding patient consent for students participating in their care. This change was accepted and is reflected in Section 14 of the proposed regulation draft. The Association also requested that the supervision requirements for students in the original regulation draft be updated to be more consistent with training models. This change was accepted and is reflected in Section 14 of the proposed regulation draft. The Association requested that temporary licensed genetic counselors be able to be supervised by qualified medical doctors. This change was accepted and is reflected in Section 11 of the proposed regulation draft. The Association requested revision to the language regarding compensation for temporary licensed genetic counselors to be reviewed and approved by the Board. This was discussed at the workshop and it was explained that this was meant to protect temporary

licensed individuals, and the Association representatives seemed to feel more comfortable about this provision. The Association asked about liability of supervisors for misconduct of temporary licensed genetic counselors. This was discussed at the workshop. These provisions are similar to what already exists for supervision by other licensees for other license categories regulated by the Board. After the discussion, the Association representatives seemed to be satisfied with the provision. The Association finally asked that the Board explore options for financial assistance or fee waivers for applicants for licensure with financial barriers in the application process. This was discussed and mentioned to the Board at the adoption hearing on January 29, 2026. At this time, the Board is not aware of options to implement this.

The Board received a letter from Cure 4 The Kids Foundation on October 27, 2025. The comments in this letter are very similar to those received from the Association and previously addressed. This letter also mentioned several things that were not suggested changes to the regulation, but, instead, were policy discussions that the Board and/or the Genetic Counseling Advisory Council may want to address in the future.

The Board received a letter from Nevada Rare Disease Advisory Council, on October 28, 2025. These comments were very similar to those received from the Association and Cure 4 The Kids Foundation and were previously addressed.

The Board received an email from Ashley Smith and signed by Michael Stephen Skylor Smith, on January 13, 2026. This email contained concerns with an event that would potentially happen January 11-16, 2026, and the writer was concerned that temporary licensed genetic counselors would be working at that time. Because the regulations were not yet effective during that timeframe and there are currently no temporary licensed genetic counselors in Nevada, this concern will not occur. Further, the regulations provide the requirements for the supervision of temporary licensed genetic counselors by a licensed genetic counselor or a physician. The regulations always require supervision for temporary licensed genetic counselors while they are practicing. The remainder of this email addressed concerns about testing for certain biomarkers and isotopes and assurance that the results of these tests will be used appropriately. Part of supervision of a temporary licensed genetic counselor is to oversee those issues and the Board believes that this proposed regulation adequately addresses this. This email was addressed in more detail by Dr. Nunes at the January 16, 2026, Public Hearing and it is contained in the record of that hearing.

The Board received an email from Julia Prinzi requesting that Section 5(1)(b) be removed from the regulation due to the timing that is available for applicants to take the required examination. This change will allow applicants to work after graduation from an approved program as a temporary licensed genetic counselor without a gap if they are unable to immediately register for the licensing examination after graduation. This is consistent with the requirements for other license types that the Board regulates and the Board removed this provision prior to adopting the regulation.

4. A List of Names and Contact Information, Including Telephone Number, Business Address, Business Telephone Number, Electronic Mail Address, and Name of Entity or Organization Represented, for Each Person Identified Above In #3, As Provided to The Agency.

Attendees at the October 28, 2025 Public Workshop in Reno:

Kate Emery
Telephone: 708-250-7869
Address: Not Provided
Business Telephone: 708-250-7869
Email: katlyn.emery@providence.org
Representing: Genetic Counselors Association of Nevada

Provided comments regarding the regulations and asked questions.

Anette Logan-Parker
Telephone: 702-481-3179
Address: 1 Breakthrough Way, Las Vegas, NV 89135
Business Telephone: 702-732-1493
Email: alogan@cure4thekids.org
Representing: Cure 4 The Kids Foundation and Nevada Rare Disease Advisory Council

Provided comments regarding the regulations and asked questions.

Attendees at the October 28, 2025 Public Workshop in Las Vegas:

Amber Schreiber
Telephone: 702-673-7097
Address: Not Provided.
Business Telephone: Not Provided.
Email: aschreiber@cure4thekids.org
Representing: Genetic Counselors Association of Nevada

Provided comments regarding the regulations and asked questions.

Julia Prinzi
Telephone: 702-732-6808
Address: 3131 La Canada St., Las Vegas, NV 89169
Business Telephone: 702-732-1290
Email: jprinzi@chcnv.org
Representing: Genetic Counselors Association of Nevada

Provided comments regarding the regulations and asked questions.

Ali Khalaf
Telephone: 909-904-2940
Address: 3730 S. Eastern Ave., Las Vegas, NV 89169
Business Telephone: Not Provided.
Email: Ali.khalaf@usoncology.com
Representing: Genetic Counselors Association of Nevada

Provided comments regarding the regulations and asked questions.

Mark E. Nunes, M.D.
Telephone: 702-672-3188
Address: 1 Breakthrough Way, Las Vegas, NV 89135
Business Telephone: 702-732-1493
Email: mnunes@cure4thekids.org
Representing: Cure 4 The Kids Foundation

Provided comments regarding the regulations and asked questions.

Sabrina Schnur
Telephone: 702-518-5822
Address: 1111 W. Proctor St., Suite 208, Carson City, NV 89701
Business Telephone: Not Provided.
Email: ss@cartwrightnv.com
Representing: Cartwright NV Government Affairs

No testimony was provided.

Zoe Houghton
Telephone: Not Provided.
Address: Not Provided.
Business Telephone: Not Provided.
Email: zoe@theperkinsco.com
Representing: Not Provided.

No testimony was provided.

Attendees at the November 17, 2025 Public Workshop in Reno:

None.

Attendees at the November 17, 2025 Public Workshop in Las Vegas:

Julia Prinzi

Telephone: 702-732-6808

Address: 3131 La Canada St., Las Vegas, NV 89169

Business Telephone: 702-732-1290

Email: jprinzi@chcnv.org

Representing: Genetic Counselors Association of Nevada

Provided comments regarding the regulations and asked questions.

Daniel Rodriguez

Telephone: Not Provided.

Address: Not Provided.

Business Telephone: Not Provided.

Email: danielrodriguez@nationwideperfusion.net

Representing: Perfusion

No testimony was provided.

Samantha Barnes

Telephone: 702-994-8304

Address: 400 N. Stephanie St., Henderson, NV 89014

Business Telephone: Not Provided.

Email: Samantha.barnes@usoncology.com

Representing: CCCN

No testimony was provided.

Amber Schreiber

Telephone: 702-673-7097

Address: Not Provided.

Business Telephone: Not Provided.

Email: aschreiber@cure4thekids.org

Representing: Genetic Counselors Association of Nevada

Provided comments regarding the regulations and asked questions.

Mark E. Nunes, M.D.

Telephone: 702-672-3188

Address: 1 Breakthrough Way, Las Vegas, NV 89135

Business Telephone: 702-732-1493

Email: mnunes@cure4thekids.org

Representing: Cure 4 The Kids Foundation

Provided comments regarding the regulations and asked questions.

Attendees at the January 16, 2026 Public Hearing in Reno:

None.

Attendees at the January 16, 2026 Public Hearing in Las Vegas:

Sabrina Petrel
Telephone: 702-518-5822
Address: 1111 W. Proctor St., Suite 208, Carson City, NV 89701
Business Telephone: Not Provided
Email: danielrodriguez@nationwideperfusion.net
Representing: NV Public Health Association

No testimony was provided.

Mark E. Nunes, M.D.
Telephone: 702-672-3188
Address: 1 Breakthrough Way, Las Vegas, NV 89135
Business Telephone: 702-732-1493
Email: mnunes@cure4thekids.org
Representing: Cure 4 The Kids Foundation

Provided comments regarding the regulations and asked questions. Provided testimony addressing all the written comments on the regulation that had been received.

5. A Description of How Comment Was Solicited from Affected Businesses, A Summary of Their Response, and an Explanation How Other Interested Persons May Obtain a Copy of the Summary.

The Board solicited comments from any potentially impacted businesses by reaching out to various business chambers and associations. Copies of the Board's proposed regulation draft were sent to the following organizations on September 26, 2025:

- Better Business Bureau of Northern Nevada, Inc.
- Better Business Bureau of Southern Nevada, Inc.
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- Clark County Medical Society
- Ely Rural Nevada Development Corporation
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- Great Basin College – Winnemucca
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- Las Vegas Chamber of Commerce
- Las Vegas Latin Chamber of Commerce

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- Reno/Sparks Chamber of Commerce
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Nevada State Board of Medical Examiners - Reno, NV

Nevada State Board of Medical Examiners Website - <https://medboard.nv.gov/>

State Library, Archives and Public Records - Carson City, NV

No public comment was received at the regulation workshops, public hearing, or Board meeting on January 29, 2026, wherein the Board adopted the regulations, indicating that the Board's proposed regulations would have a direct and significant economic burden upon a small business or directly restrict the formation, operation, or expansion of a small business. At the regulation workshops held on October 28, 2025, and November 17, 2025, and the public hearing held on January 16, 2026, stakeholders, potential license applicants, and members of the public were invited to attend, ask questions about the regulations, and provide public comment regarding the regulations. Multiple individuals attended those meetings, and all the comments that they provided were in support of the Board's proposed regulations, asked questions about provisions contained in the Board's proposed regulations, and suggested potential changes to the Board's proposed regulations for clarity or to better reflect what might work best in the practice setting or better assist new licensees. No written public comment was received prior to the regulation workshop, public hearing, or adoption meeting indicating

that the Board's proposed regulations would have a direct and significant economic burden upon a small business or directly restrict the formation, operation, or expansion of a small business. All the public comments received at the regulation workshops and public hearing, as well as the written comments received throughout the process, were in favor of the regulations or contained questions about the regulations that were later answered. No public comment was received at the January 29, 2026 Board meeting.

The Board received an email Weldon Havins, M.D., on October 15, 2025. The Board received a letter from the Genetic Counselors Association of Nevada, on October 21, 2025. The Board received a letter from Cure 4 The Kids Foundation on October 27, 2025. The Board received a letter from Nevada Rare Disease Advisory Council, on October 28, 2025. The Board received an email from Ashley Smith signed by Michael Stephen Skylor Smith, on January 13, 2026. The Board received an email from Julia Prinzi on January 7, 2026. None of these emails or letters indicated that the proposed regulation would have a direct and significant economic burden upon a small business or directly restrict the formation, operation, or expansion of a small business.

A summary of the public comment received regarding LCB File No. R055-25 is available upon request by contacting Deputy Executive Director Bradley at bradleys@medboard.nv.gov or by telephone at 775-324-9365.

6. If the Regulation Was Adopted Without Changing Any Part of the Proposed Regulation, A Summary of the Reasons for Adopting the Regulation Without Change.

This regulation was adopted by the Board at a public meeting held on Thursday, January 29, 2026. It was adopted with three changes. Two of these changes were necessary after reviewing the regulation draft and the Board's original draft and intent. The third change was because of written comment received from Ms. Prinzi on January 7, 2026. The issue that she raised needed to be addressed to allow temporary licensed genetic counselors to be licensed and able to work after graduation without a gap if they cannot register for the required licensing examination immediately after graduation. These three changes were also reviewed and discussed with members of the public at the January 16, 2026 public regulation hearing prior to the Board discussing them and adopting the regulation with those changes on January 29, 2026.

7. The Estimated Economic Effect of the Adopted Regulation on the Businesses Which It Is to Regulate and on the Public. These Must Be Stated Separately, And Each Case Must Include: (a) Both Adverse and Beneficial Effects; and (b) Both Immediate and Long-Term Effects.

(a) Both Adverse and Beneficial Effects.

No, the proposed regulation does not impose a direct and significant economic burden upon a small business or directly restrict the formation, operation, or expansion of a small business. These proposed regulations implement the provisions of SB189, which was passed in the 2025 Legislative Session. Licensing this new profession, genetic counselors, should benefit small businesses by allowing them to hire additional licensed personnel to help with the provision of medical care to the citizens of Nevada.

(b) Both Immediate and Long-Term Effects.

The Board believes that the proposed regulation will have immediate and long-term direct economic benefit on the business of the practice of medicine because the regulation will allow business in Nevada to hire additional licensed personnel to help with the provision of medical care to the citizens of Nevada. The Board believes that the proposed regulation will have a positive direct economic effect on the public by allowing more licensed personnel to provide them with medical care. This will provide the public with more access to medical care and potentially lower medical care costs. Genetic counselors are utilized in many areas of medicine to assist patients with making informed choices about their medical care. Licensing genetic counselors in Nevada will be good for both businesses and patients.

8. The Estimated Cost to the Agency for Enforcement of the Adopted Regulation.

Licensing a new profession, genetic counselors, will cause increased costs for the Board. However, the Board hopes that the increased costs will be covered in time by the increased licensing fees received from the new licensees.

9. A Description of Any Regulations of Other State or Government Agencies Which the Proposed Regulation Overlaps or Duplicates and a Statement Explaining Why the Duplication or Overlapping Is Necessary. If the Regulation Overlaps or Duplicates a Federal Regulation, the Name of the Regulating Federal Agency.

To the Board's knowledge, the proposed regulations do not overlap or duplicate the regulations of other state or local governmental agencies or any federal regulations.

10. If the Regulation Includes Provisions That Are More Stringent Than a Federal Regulation Which Regulates the Same Activity, a Summary of Such Provisions.

To the Board's knowledge, the proposed regulations do not regulate the same activity addressed in a federal regulation.

11. If the Regulation Provides a New Fee or Increases an Existing Fee, the Total Annual Amount the Agency Expects to Collect and the Manner in Which the Money Will Be Used.

In 2026, the Board anticipates receiving approximately 75 new applications for licensure as a genetic counselor. This would result in the Board collecting \$22,500 in application fees, \$28,000 in registration fees for the full biennium (applications received and licenses issued prior to July 1, 2026), and \$1,000 in registration fees for the second half of the biennium (applications received and licenses issued after July 1, 2026) for a total receipt of \$51,500 in new licensing fees. The Board anticipates paying its licensing software vendor \$18,000 in 2026 to add this new license type to the Board's licensing system which will allow the Board to receive and process electronic applications. The remaining \$33,500 received in 2026 will be used to pay for staff time in reviewing and processing applications for licensure, as well as utilized to regulate and enforce Nevada law regarding genetic counselors.

In 2027, the Board anticipates receiving approximately 10 new applications for licensure as a genetic counselor. This would result in the Board collecting \$3,000 in application fees, \$1,000 in registration fees for the second half of the biennium (applications received and licenses issued from January 1, 2027 through June 30, 2027), and \$2,000 in registration fees for applications received in the first half of the new biennium (applications received and licenses issued from July 1, 2027 through December 31, 2027) for a total receipt of \$6,000 in new licensing fees. The Board will also process renewals for genetic counselors in 2027, and the Board anticipates receiving renewal applications from approximately 80 genetic counselors. This will result in receiving approximately \$32,000 in genetic counselor renewal fees, for a total receipt of fees from genetic counselors of \$38,000. The Board will use this money to pay for staff time in reviewing and processing applications for licensure and applications for license renewals and to regulate and enforce Nevada law regarding genetic counselors.