

**From:** [Alex Tanchek](#)  
**To:** [Legislative Commission](#)  
**Cc:** [Sarah Adler](#); [Angela Berg](#)  
**Subject:** Legislative Commission Public Comment Agenda Item II - NAPNA (R087-25)  
**Date:** Wednesday, February 25, 2026 5:15:51 PM  
**Attachments:** [R087-25 Letter of Support NAPNA 2026-02-25.pdf](#)

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Good evening.

Attached as public comment for tomorrow's Legislative Commission meeting please find a letter from Dr. Angela Berg, president of the Nevada Advanced Practice Nurses Association, in support of Board of Nursing regulation R087-25.

Thank you,  
Alex

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February 25, 2026

**RE: Support for LCB File No. R087-25**

Dear Chair Jauregui and Members of the Legislative Commission:

On behalf of the Nevada Advanced Practice Nurses Association (NAPNA), I write in strong support of R087-25, regulation approved by the Nevada State Board of Nursing to implement Sections 66 through 71 of AB 319 (2025).

During the 2025 Session, the Legislature made a clear policy determination: appropriately supervised delegation to medical assistants would improve access to care and support Nevada's health care workforce. The Board of Nursing was expressly authorized to develop regulations to implement that policy. R087-25 faithfully executes that legislative directive and establishes a structured, accountable framework for delegation.

This regulation advances three important public policy objectives.

**Increases access to care and strengthens workforce capacity.**

Nevada continues to face significant shortages of licensed health care professionals, particularly in rural and underserved communities. Allowing advanced practice registered nurses (APRNs) to delegate appropriate clinical tasks enables those practitioners to devote more time to complex assessment, diagnosis, and treatment—functions that require their advanced education and training. This improves efficiency within practices, expands patient throughput, and supports the sustainability of small and independent clinics across the State.

**Establishes clear guardrails and accountability.**

R087-25 does not create unchecked delegation authority. Instead, it sets forth defined conditions and safeguards, including:

- Alignment of any delegated task with the delegating practitioner's lawful scope of practice;
- A requirement that the practitioner personally determine the medical assistant possesses the knowledge, skill, and training to safely perform the task;
- Employer responsibility for training and documentation of competency;
- Immediate availability for oversight when invasive procedures are delegated, subject to narrowly tailored rural provisions; and
- A prior practitioner-patient relationship before remote supervision may occur.

Far from weakening existing standards, the regulation clarifies expectations, reinforces supervision requirements, and ensures accountability remains squarely with the licensed practitioner. Delegation does not transfer professional responsibility; it operates within it.



**Provides regulatory clarity and consistency.**

The Legislature's amendments to NRS Chapter 632 created the need for implementing regulations specific to nursing practice. R087-25 harmonizes delegation standards with those applicable to other health care professionals while preserving the distinct scope and responsibilities of nurses under Nevada law. By doing so, it eliminates ambiguity, promotes uniform application statewide, and reduces the risk of inconsistent interpretation.

Importantly, nothing in this regulation permits delegation of nursing judgment or abdication of professional responsibility. The licensed nurse remains responsible for assessment, oversight, and patient safety at all times. The regulation simply provides a structured mechanism for team-based care—reflecting how modern health care is delivered in clinics, community practices, and rural settings throughout Nevada.

When AB 319 was considered before the Senate Committee on Commerce and Labor, both the Board of Nursing and NAPNA testified that enabling appropriate delegation would expand capacity and improve care delivery. That remains true today. R087-25 carries out the Legislature's intent in a measured, carefully drafted manner that protects patients while strengthening Nevada's health care system.

For these reasons, NAPNA respectfully urges the Legislative Commission to approve R087-25.

Thank you for your consideration and for your continued commitment to improving access to high-quality health care in Nevada.

Respectfully,

Angela Berg, DNP, APRN, CPNP, AHPN-BC  
President  
Nevada Advanced Practice Nurses Association