

From: [Paul Klein](#)
To: [Paul Klein](#)
Subject: Concerns Regarding Regulation R102-25 at 4/28 Legislative Commission
Date: Wednesday, April 22, 2026 12:03:15 PM
Attachments: [Concerns Regulation R102-25 .pdf](#)

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Re: Concerns Regarding Regulation R102-25 – Creating Barriers for Licensed Physical Therapists and Physical Therapist Assistants, and Limiting Student Access to Care

Legislative Commission:

I represent the State of Nevada Physical Therapy Board (PTB) and am writing to share information regarding regulation R102-25.

The regulation adds educational requirements for physical therapists and physical therapist assistants who wish to provide services in Nevada public schools. Specifically, it requires:

- Physical therapists to hold both a current PTB license and a doctorate degree in physical therapy.
- Physical therapist assistants to hold both a current PTB license and an associate's degree or higher in physical therapy.

This regulation passed through the Commission on Professional Standards in Education and did not come before the PTB, although it directly affects the Board's licensees and the physical therapy profession. This may indicate a potential gap in the regulatory process that can disenfranchise licensees by imposing requirements on which they had little or no opportunity to provide feedback.

The PTB does not meet until after the Legislative Commission considers this regulation. This timing prevents the Board from properly vetting the regulation in a public setting and from considering a vote to provide a formal recommendation.

One point for the Legislative Commission to consider is that school-based physical therapy is a required related service under the Individuals with Disabilities Education Act. Students with disabilities rely on physical therapist and physical therapist assistant services to improve mobility, participate in the classroom, and achieve their individualized education program goals. Changes such as those created by R102-25 may reduce the number of available providers and could therefore impact the availability and consistency of these services, particularly in rural communities.

I appreciate the opportunity to share this information and are available to provide additional details or discuss this matter further if it would be helpful.

Thank you for your time and consideration.

****Letter attached***

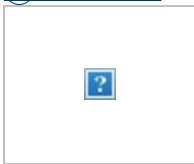
Paul Klein



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