

**From:** [executivedirector@nvababoard.org](mailto:executivedirector@nvababoard.org)  
**To:** [Sandra Jauregui Assemblymember](#); [Steve Yeager Assemblymember](#)  
**Cc:** [Legislative Commission](#); [Nicole Cannizzaro Senator](#); [Skip Daly Senator](#); [Ira Hansen Senator](#); [Rochell.Nguyen@sen.state.nv.us](mailto:Rochell.Nguyen@sen.state.nv.us); [Melanie Scheible Senator](#); [Robin Titus Senator](#); [Shea Backus Assemblymember](#); [Gregory T. Hafen II Assemblymember](#); [Alexis Hansen Assemblymember](#); [Howard Watts Assemblymember](#)  
**Subject:** In Opposition of LCB File No. R074-25  
**Date:** Monday, September 21, 2026 12:44:10 PM  
**Attachments:** [Assemblymember Sandra Jauregui.pdf](#)  
**Importance:** High

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Dear Chairperson Jauregui and Members of the Legislative Commission,

The Nevada Board of Applied Behavior Analysis contacted each of you in June regarding our concerns then, to proposed regulations, LCB File No. R074-25, which are coming before the Committee this week.

Unfortunately, there has been no additional discussion regarding the proposed regulations and the myriad of concerns expressed by many of the Boards prior to B&I's adoption regarding, among other things, the broad statutory concepts that remain undefined and open to interpretation; operational requirements unrelated to statutory duties; implementation concerns including expanded requirements, timelines and procedural mandates.

The lack of a meaningful small business or economic impact analysis is dangerous. Licensing boards are funded almost entirely through license fees and to ignore the impact of these regulations on increased operational costs and staff involvement/requirements is avoiding real concerns and side-stepping the intent of the economic impact review process.

There has been no additional effort by B&I to discuss any of the identified concerns with the Boards; provide any clarification of language or processes included in the regulations; or any attempt to develop a more comprehensive, collaborative understanding of concerns presented throughout this process.

Because of this, the Nevada Board of Applied Behavior Analysis remains in opposition of the approval of LCB File No. R074-25. We remain committed, along with the other licensing Boards, to work through the current obstacles toward a more unified solution.

Please let me know if you have any questions or need additional information.

Wendy Knorr, Executive Director  
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## BOARD OF APPLIED BEHAVIOR ANALYSIS



## STATE OF NEVADA

June 19, 2026

Dear Chairwoman Jauregui,

The Nevada Board of Applied Behavior Analysis respectfully requests consideration of the following concerns prior to approval of **LCB File No. R074-25**.

The Board recognizes that NRS 232.8413 and NRS 232.8415 authorize the development of regulations intended to improve *consistency, transparency, and administrative coordination* among Nevada's licensing boards. We support those goals. However, several provisions within the proposed regulations raise significant concerns regarding statutory authority, implementation feasibility, and alignment with legislative intent.

While portions of the proposed regulations appear consistent with the authority granted by the Legislature, other provisions move beyond administrative oversight and into operational governance of independent licensing boards. Nevada's licensing boards are creatures of statute, and the Legislature has assigned them independent regulatory authority within their respective practice areas. As proposed, several provisions risk shifting that authority to the Office of Boards and Commissions in ways not expressly contemplated by statute.

Broad statutory concepts such as "centralized administration," "uniform standards," and "oversight" remain open to interpretation. How those terms are implemented matters. Several proposed provisions rely on undefined or subjective standards, including terms such as "best practices," "adequate internal controls," "sufficient transparency," and "timely response," creating uncertainty regarding compliance expectations and consistent enforcement.

The Board is particularly concerned with provisions that prescribe detailed operational requirements unrelated to statutory duties, including mandatory attendance requirements for board members, prescriptive website content and design standards, required internal control structures, performance evaluation criteria, and investigative procedures that may conflict with processes outlined in NRS Chapters 622 and 622A. During the hearing process, boards repeatedly raised concerns regarding investigative timelines not found in statute, complaint categorization requirements, hearing officer independence, and procedural mandates that could alter established disciplinary processes.

The proposed regulations also present substantial implementation concerns. Nevada's licensing boards vary significantly in size, staffing, funding, and statutory mission. A one-size-fits-all approach may impose disproportionate administrative burdens on smaller or largely volunteer boards without corresponding improvements in consumer protection or operational efficiency. Expanded requirements for website management, complaint tracking, reporting, training, documentation, and internal controls may require resources that many boards do not currently possess.

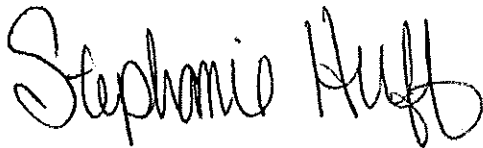
Additionally, the absence of a meaningful small business or economic impact analysis is concerning. Licensing boards are funded almost entirely through license fees. Increased administrative obligations will likely result in increased operational costs, which may ultimately affect licensees and the businesses and consumers they serve. Regulations should be reasonably related to statutory purpose and feasible to implement in practice.

Recent communications from the Office of Boards and Commissions indicating limitations in staffing and resources further underscore concerns regarding implementation feasibility and the potential for unfunded mandates. If the Office itself currently lacks capacity to support compliance efforts, additional consideration should be given to the practical impact these requirements will have on independent boards.

The Nevada Board of Applied Behavior Analysis believes the goals of consistency, transparency, and accountability can be achieved through continued collaboration and refinement of the proposed regulations. With additional stakeholder engagement and revisions responsive to board concerns, the regulations could better align with legislative intent while preserving the statutory independence of Nevada's licensing boards.

***For these reasons, the Nevada Board of Applied Behavior Analysis respectfully requests that approval of LCB File No. R074-25 be deferred pending further review, stakeholder engagement, and revision.***

Thank you for your consideration.

A handwritten signature in black ink that reads "Stephanie Huff". The signature is written in a cursive, flowing style.

Stephanie Huff, President  
Nevada Board of Applied Behavior Analysis