

From: [Nevada Board of Dispensing Opticians](#)
To: [Sandra Jauregui Assemblymember](#); [Steve Yeager Assemblymember](#); [Nicole Cannizzaro Senator](#); [Skip Daly Senator](#); [Ira Hansen Senator](#); [Rochelle Nguyen Senator](#); [Melanie Scheible Senator](#); [Robin Titus Senator](#); [Shea Backus Assemblymember](#); [Gregory T. Hafen II Assemblymember](#); [Alexis Hansen Assemblymember](#); [Howard Watts Assemblymember](#)
Cc: [Haas, Jordan](#); [Legislative Commission](#); Lettenj@yahoo.com
Subject: Opposition to R074-25; 9/24/26 Committee Review
Date: Tuesday, September 22, 2026 7:32:43 PM
Attachments: [2026_9-24 NVBDO Opposition to R074-25.pdf](#)

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Dear Chair Jauregui and Members of the Legislative Commission:

I am writing to reiterate the opposition of the Board of Dispensing Opticians to Proposed Regulation R074-25 in its current form. We previously submitted a letter of opposition to Madame Chair Jauregui on 6/24/26, and our concerns have not yet been addressed by the Office of Boards, which is proposing the regulation.

Our primary concern is the administrative and financial burden the regulation will place on the smaller occupational licensing boards. We believe the boards will eventually be tasked with financing the operation and administrative oversight of the Office of Boards, which will threaten the financial viability of our own agencies. We are also concerned that the financial stresses this regulation will place on the boards will be used as justification to eliminate or merge several of the smaller boards, to the detriment of our licensees and the public.

I have attached a detailed letter outlining the full scope of these concerns for your review ahead of the upcoming vote. For the reasons stated in our letter, our Board respectfully requests that you vote against approving this regulation at your 9/24/26 meeting. Thank you for your time and consideration.

Sincerely,

Corinne Sedran
Executive Director

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STATE OF NEVADA

BOARD OF DISPENSING OPTICIANS

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To the Members of the Legislative Commission

Nevada State Legislature
401 S Carson Street
Carson City, NV 89701

September 22, 2026

Re: Opposition to Approval of Proposed Regulation R074-25

Dear Chair Jauregui, Vice Chair Yeager, and Members of the Commission:

The Board of Dispensing Opticians respectfully requests that the Legislative Commission vote against approval of Proposed Regulation R074-25 in its current form in consideration of the following concerns which our board relayed to the Office of Boards, Commissions, and Council Standards (Office) as written comments on 11/14/25, 3/23/26, and 5/4/26, and have remained unaddressed by the Office:

Our first concern is that the proposed regulation does not adequately develop its underlying statutes, NRS 232.8413, and 232.8415, which created the Office. It does not outline the structure of the Office, define the scope of its powers, or delineate its responsibilities. It also does not define several key terms that are essential to understanding the Office's mandate. For example, NRS 232.8415 lists the primary function of the Office as centralized administration of the boards, however, "centralized administration" is not defined anywhere in the regulation. Likewise, the statute alludes to "consumer protection," "efficacy," and "efficiency," and while the regulation would allow the Office to audit the boards for these qualities, it does not outline any of the specific standards by which they will be evaluated.

The statutes also task the Office with creating a uniform set of standards for investigations, licensing and discipline, legal representation, and structural standards. However, the regulation does not include specific standards for many of these listed responsibilities, and the standards which are listed may conflict with preexisting board statutes, such as provisions related to complaints and investigations. We also note that many of the oversight functions the Office has already implemented are not delineated in the proposed regulation. These include requiring the boards to obtain pre-approval from the Office to propose new regulations, make bill draft requests, execute contracts for services, and for many other administrative matters that are governed by our individual board statutes.

Another concern is the Office has not sufficiently evaluated the financial impact the proposed regulation would have on the licensing boards. It would increase the boards' administrative burdens by creating new reporting requirements, as well as duplicating many preexisting reporting obligations related to licensing, disciplinary actions, and financial audits. It would also

require the boards to create searchable online databases for disciplinary actions, as well as keep copies of all their administrative reports on their websites. Much of this information is currently supplied upon receipt of a public records request, however, maintaining all this information on a website will be burdensome and expensive, and the Office has indicated it will not be providing any of its IT services to the boards. These new obligations will inevitably result in increased costs related to staffing, technology upgrades, and ongoing operational expenses. Many of the smaller licensing boards operate within limited budgets that are already stretched thin by their existing statutory responsibilities. Without additional resources, these new requirements will lead to delays, reduced services for the license holders and public, and increased licensing fees.

Finally, the concerns and recommendations submitted by the boards throughout the rulemaking process were not adequately considered by the Office. Board members and staff with knowledge and practical experience in the administration of a board office provided feedback regarding the regulation's shortcomings and potential financial impact. We did not receive an adequate or transparent explanation of why these significant concerns were dismissed by the Office. Before the regulation is approved by the Commission, the Office should be required to conduct a thorough financial impact analysis, fully consider the comments and concerns of the boards and their staff and licensees, and revise the regulation to include a comprehensive outline of the structure, roles, and responsibilities of the Office. We respectfully request that the Legislative Commission vote against approving the proposed regulation until these concerns are addressed.

Thank you for your time and consideration,

Jennifer Letten
Board President

Corinne Sedran
Executive Director