

**LEGISLATIVE REVIEW OF ADOPTED REGULATIONS**  
**AS REQUIRED BY NRS 233B.066**  
**LCB FILE R083-22**

The following statements is submitted for adopted amendments to the Nevada Administrative Code (NAC) Chapter 638.

**1. A clear and concise explanation of the need for the adopted regulation.**

This regulation is necessary to update the regulations pertaining to review and licensure utilizing alternative education pathways for Licensed Veterinary Technicians (LVTs) and Veterinary-Technicians-in-Training (VTITs)

**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.**

Copies of the proposed regulations, notices of workshop and notices of intent to act upon the regulation were sent by email to persons who were known to have an interest in the subject of veterinary medicine as well as any persons who had specifically requested such notice. These documents were also made available at the website of the Nevada Board of Veterinary Medical Examiners, [nvvetboard.nv.gov](http://nvvetboard.nv.gov), the office of the Nevada Board of Veterinary Medical Examiners at 4600 Kietzke Ln. Suite O-265, Reno, NV 89502, Sierra View and Clark County library, [notice.nv.gov](http://notice.nv.gov), the Office of the Attorney General in Reno and Las Vegas. A copy of the notice of hearing with proposed regulation was mailed to 22 county public libraries in Nevada.

The topic of alternative education standards for LVTs/VTITs in Nevada began with an Ad-Hoc committee of 3 Board members that considered the possibilities and need for a better structure for consideration of education programs that were not AVMA accredited veterinary technician programs-namely, individuals that had obtained Bachelor of Science degrees and expressed and interest in practicing as LVTs in the field. The committee held three public committee meetings on 9/14/21, 11/11/21, and 12/7/21 to discuss with stakeholders, including veterinary technician school administrators, what a structure alternative education program could look like while still maintaining the standards that the field requires. The public response was primarily interested that individuals are properly qualified to ensure public safety and the Board take measures to be mindful of not lowering the educational requirements asked of Nevada technicians. Comments were also made related to the need for qualified individuals in Nevada. Following these meetings, the committee made recommendations for draft regulations.

A workshop to consider those regulations was held in conjunction with the quarterly meeting of the Board on September 14, 2022, and the minutes of that meeting, attached hereto, contain a summary of the discussion held regarding the proposed amendments. Thereafter, a public hearing was held on October 21, 2022, the Executive Director of the Board of Veterinary Medical Examiners issued a Notice of Intent to Act Upon a Regulation which included changes incorporated in the proposed amendments from public comment submitted during the rulemaking process.

Interested parties may obtain a copy of the summary by contacting the Board office at 775-688-1788 or emailing at [vetbdinfo@vetboard.nv.gov](mailto:vetbdinfo@vetboard.nv.gov)

**3. The number persons who:**

- (a) Attended each hearing:** September 14, 2022(0); October 21, 2022 (0)
- (b) Testified at each hearing:** September 14, 2022(0); October 21, 2022 (1)
- (c) Submitted to the agency written comments:** 0

**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.**

- Dennis Lopez, [dlopez9@earthlink.net](mailto:dlopez9@earthlink.net)

**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.**

Comments were solicited from affected businesses in an email correspondence sent August 25, 2022, to 390 facility associated emails and the Board office mailing list with a copy of the proposed regulations and request to submit any questions or comments regarding the regulations and if there would be any foreseeable impact on business. All written responses are attached in Exhibit A below.

**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.**

The permanent regulation was adopted on October 21, 2022, with no changes. No changes were suggested at that time by either the Board or the public.

**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;**
- (b) Both immediate and long-term effects;**
- (c) Both direct and indirect effects.**

**(a) Both adverse and beneficial effects**

The regulations should have no foreseeable negative effect. Beneficially, the various changes bring structure to reviewing alternate education parameters for qualified individuals who desire to become a licensed veterinary technician. It also gives clarity to applicants whose education does not currently meet the education requirements to obtain educational components to qualify for licensure.

**(b) Both immediate and long-term effects.**

The immediate effect will be clarity to applicants regarding alternate education possibilities and steps that applicants can take to bring their education gaps to meet criteria for licensure. Long term, the Board foresees an increase in qualified licensees from the alternate education program that will be able to ensure continued high-quality care in Nevada in line with the rising need for

veterinary care by the public.

(c) Both direct and indirect effects

Directly, the regulations will give prospective applicants with non-veterinary technician education but who have received related education a path to licensure as a veterinary technician and veterinary technician-in-training. Indirectly, this should help increase the number of qualified veterinary technicians in practice and help alleviate the burnout and understaffing that is escalating in veterinary medicine.

**8. The estimated cost to the agency for enforcement of the adopted regulation.**

There is no additional cost to the agency for enforcement of this regulation.

**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.**

There are no other state or government regulations that the proposed regulation duplicates.

**10. If the regulation includes provisions that are more stringent than a federal regulation which regulates the same activity, a summary of such provisions.**

There are no federal regulations that apply.

**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.**

This regulation does not provide a new fee or increase an existing fee.