DIVISION OF CHILD AND FAMILY SERVICES
LCB File No. R103-24P
Informational Statement per NRS 233B.066

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

The regulation modifications found in LCB File No. R103-24P allow for the establishment and operation of Qualified Residential Treatment Programs (QRTP) in Nevada. The new programmatic proposed regulations are a result of the requirement for states to comply with federal requirements within the Family First Prevention Services Act of 2018 (FFPSA) specific to QRTPs. This will provide a trauma focused multidisciplinary placement option for youth in need of a certain level of care. These provisions focus on various aspects of QRTP facilities regarding admission criteria, staff training, reporting, creation and adherence to policies, delivery of trauma-informed treatment for children, case plans and discharge transitions. The regulations are necessary for Nevada to provide program requirements in Nevada Administrative Code for this new facility type/level of care.

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.

Below is a summary of how public comment was solicited by the Division of Child and Family Services (DCFS), Nevada's Department of Human Services, and a summary of the public's response.

Description of How Public Comment was Solicited

Interested person(s) were sent copies of the proposed regulations, the notice of public workshop and the public hearing notice of intent to adopt via email, upon request, or by interest. The email list included 40 individuals.

Public notices were posted at the following locations, in accordance with NRS Chapter 241:

DCFS, 500 E. Warm Springs Rd., Ste 100, Las Vegas, NV 89119
DCFS, 4126 Technology Way., Ste. 300, Carson City, NV 89706
Northern Nevada Child and Adolescent Services, 2655 Enterprise Rd., Reno, NV 89512
Nevada Youth Parole Bureau, 6171 W. Charleston Blvd., Bldg. 15, Las Vegas, NV 89146 DCFS, 1010 Ruby Vista Dr. Suite 101, Elko, NV 89801
DCFS, 1485 West Warm Springs #109 Henderson, NV 89014
Division of Child and Family Services website:
http://dcfs.nv.gov/Meetings/2025/2025MeetingsandAgendas/

Nevada Legislature website: https://www.leg.state.nv.us
Nevada Public Notices website: https://notice.nv.gov/

Summary of Public Response

Through the course of the public workshop and the adoption hearing, one verbal comment was made.

Public Workshop

On September 30, 2024, a public workshop was held to allow the public to provide input regarding the proposed QRTP regulations. There were 29 participants. DCFS had one public verbal comment from Jill Marano, requesting the addition of federal language per 42 U.S.C. § 672(k)(4)(A) into LCB File No. R103-24P Section 7(b).

(f) Jill Marano, Director,
(f) 702-232-2525
(f) 121 Martin Luther King Blvd. Las Vegas, NV. 89106
(f) 702-455-1184
(f) Jill.Marano@ClarkCountyNV.gov
(f) Clark County Family Services

Adoption Hearing

On September 24, 2025, a public adoption hearing was held. There were 11 participants that attended: 4 in person and 7 virtually. The agenda had itemized an opportunity to provide comment at the beginning of the hearing and at the end. There was no public comment received.

How Other Interested Persons May Obtain a Copy of the Summary

Any person interested in obtaining a copy of the public workshop or adoption hearing meeting materials may email, call, or mail in a request to Amber Howell at:

Division of Child and Family Services
4126 Technology Way
Carson City, NV 89706
Phone: (775) 687-9047
Email: ahowell@dcfs.nv.gov

On September 24, 2025, a public adoption hearing was held. There were 11 participants that attended: 4 in person and 7 virtually. There were no public comments received.

3. The number of persons who attended each hearing, testified at each hearing and submitted written statements to the agency.

Public Workshop 9/30/2024: 29 participants in attendance, 1 person testified, no written comments.

Public Hearing 9/24/2025: 11 participants in attendance, no testimony or written comments.

4. Contact information for persons in attendance:

Please refer to attached list of attendees.

5. A description of how comments were solicited (i.e. notices), from affected businesses, a copy of their response, and an explanation of how other interested persons may obtain a copy of the summary.

The request for comments was solicited via email and posting on appropriate websites.

Small Business Impact Questionnaire

On December 21, 2023, pursuant to NRS 233B.0608(2)(a), DCFS sent out the small business impact questionnaire for small businesses to ten (10) foster care agency owners, who may be impacted by the changes.

On February 7, 2024, DCFS sent a second small business impact questionnaire to eleven (11) foster care facilities that may be impacted. The Division received one (1) response indicating that the proposed regulations would not have an adverse effect on their facility. The results are summarized in the attached Small Business Impact Statement dated March 6, 2024.

6. If, after consideration of public comment, the regulation was adopted without changing any part of the proposed regulation, a summary of the reasons for adopting the regulation without change. The statement would explain the reasons for making any changes to the regulation as proposed.

There were no requests to change the proposed regulation as drafted in LCB File No. R103-24P.

7. The estimated economic effect of the regulation on the business which it is to regulate and on the public. These must be stated separately, and in each case must include: (a) Both adverse and beneficial effects; and (b) Both immediate and long-term effects.

- *Adverse immediate effects*: There are no anticipated immediate adverse economic effects on the public, nor the facilities that will be regulated.

- *Adverse long-term effects:* There are no anticipated long-term adverse economic effects on the public, nor the facilities that will be regulated.
- *Beneficial immediate effects:* Interested facilities and child welfare agencies will now have the program requirements outlined in NAC for this level of care. Separate regulations are needed to establish the licensing requirements for QRTPs, which is the responsibility of the State Board of Health to implement. Members of the public who are in need of this level of care, will now have this available in state to support children, youth and families.
- *Beneficial long-term effects:* The proposed regulations will allow Nevada to operate QRTP's, and child welfare agencies can access this level of care for those children who historically needed this placement type but were not available within the state. Members of the public who are in need of this level of care, will now have this available in state as a long-term option mitigating possible placement disruption for children and youth.

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

There is no estimated cost to implement and enforce the QRTP programming regulations (LCB File No. R103-24P). LCB File No. R103-24P refers to QRTP programming and will be the responsibility of DCFS to enforce. There are separate QRTP licensing regulations in development, which may have an estimated cost to enforce and implement. The second regulatory provisions for QRTP licensing requirements will be promulgated by another Division within the Department of Human Services (DHS). The provisions within R103-24P do not include a licensing or enforcement fee due to these provisions only relate to program requirements of a QRTP facility.

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, name the regulating federal agency.

The proposed regulations do not overlap or duplicate any federal or Nevada state regulations.

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

There are no federal regulations addressing the same activity.

11. If the regulation establishes a new fee or increases an existing fee, a statement indicating the total annual amount the agency expects to collect and the manner in which the money will be used.

These regulations do not address any fees.

Public Hearing Attendance 9/24/2025		
Name	**Contact**	**Organization**
Marla McDade Williams	mmcdade@dcfs.nv.gov	DCFS
Karla Sanchez	ksanchez@dcfs.nv.gov	DCFS
Amber Howell	ahowell@dcfs.nv.gov	DCFS
Joseph Filippi	j.filippi@dcfs.nv.gov	DCFS
Lori Brown	lori.brown@dcfs.nv.gov	DCFS
Betsey Crumrine	bcrumrine@dcfs.nv.gov	DCFS
Mandy Hall	mhall@dcfs.nv.gov	DCFS
Laurie Jackson	ljackson@dcfs.nv.gov	DCFS
Veronica Hagan	vhagen@dcfs.nv.gov	DCFS
Sabrina Schnur	ss@cartwrightnv.com	Cartwright NV
Cadence Matijevich	CMatijevich@washoecounty.gov	Washoe County Human Services Agency

Public Workshop Attendance 9/30/2024		
Name	**Contact**	**Organization**
Marla McDade Williams	mmcdade@dcfs.nv.gov	DCFS
Amber Howell	ahowell@dcfs.nv.gov	DCFS
Megan Tingle	mtingle@dcfs.nv.gov	DCFS
Lupie Janos	mjanos@dcfs.nv.gov	DCFS
Rosanna Dagdagan	R.dagdagan@dcfs.nv.gov	DCFS
Rhonda Sinclair	Rhonda.Sinclair@dcfs.nv.gov	DCFS
Sara Velasquez	sara.velasquez@dcfs.nv.gov	DCFS
Marcie Trier	MTrier@dcfs.nv.gov	DCFS
Allyson Mosbacher	amosbacher@dcfs.nv.gov	DCFS
Jessica Shephard	jshephard@washocounty.gov	Washoe County Human Services Agency
Melissa Coates	mcoates@washoecounty.gov	Washoe County Human Services Agency
Lindsarae Prudden	lprudden@washocounty.gov	Washoe County Human Services Agency
Anastasia Cooper	acooper@washoecounty.gov	Washoe County Human Services Agency
Amy Sandvik	asandvik@washoecounty.gov	Washoe County Human Services Agency

Jill Marano	jill.marano@clarkcountynv.gov	Clark County Family Services
Jennifer Erbes	jennifer.erbes@clarkcountynv.gov	Clark County Family Services
Oscar Benavides		Clark County Family Services
Amity Latham	dormana@clarkcountynv.gov	Contact information not provided
Jonathon Norman	jnorman@lacsn.org	Legal Aid Center of Southern Nevada
Jaymie Jensen	Contact information not provided	Contact information not provided
Ali Caliendo	Ali@FosterKinship.org	Foster Kinship
Christina Chang	Contact information not provided	Contact information not provided
Theresa Parish	Contact information not provided	Contact information not provided