

JOE LOMBARDO
Governor

DR. KRISTOPHER SANCHEZ
Director

STATE OF NEVADA



PERRY FAIGIN
NIKKI HAAG
MARCEL F. SCHAEERER
Deputy Directors

MERLE LOK
Executive Director

**DEPARTMENT OF BUSINESS AND INDUSTRY
OFFICE OF NEVADA BOARDS, COMMISSIONS AND COUNCILS STANDARDS
NEVADA STATE BOARD OF ORIENTAL MEDICINE**

*****PUBLIC NOTICE***
WORKSHOP MINUTES
June 23, 2026 @ 2:00 PM
Via Zoom teleconference and physical location**

Board Staff:
Merle Lok, Executive Director

Public:
Dr. Nancy Brandt
Dr. David Flater
Dr. Kris Justesen

1. Open Workshop: Opening remarks; intent of regulations; opening public comment

ED welcomes attendees and states that the intent is to update regulations, such as changing the name of the national organization, changing fees, and changing the acupuncture point injection therapy requirements to reflect national standards.

The following items are summaries of the emails received by the Board of Oriental Medicine:

Dr. Nancy Brandt opposes proposed changes to Nevada's acupuncture point injection therapy requirements. Her position is that there is an economic impact as increasing training

requirements to 40 CEUs would substantially raise certification costs (from about \$4,000 to \$8,000–\$9,000), create financial burdens for practitioners and businesses, reduce the number of certified providers, and limit patient access to treatment, and requests the Nevada Board of Oriental Medicine to reconsider the proposed changes due to their economic and professional impact.

Dr. Susan Shultz opposes Nevada's proposed requirement of a 40-hour NCCAOM injection therapy certification as unnecessarily burdensome. Her position is that many practitioners only perform basic injections, making the advanced certification excessive, costly, and time-consuming. Based on Washington State's experience, she recommends requiring 24 hours of postgraduate training instead, which she believes is sufficient to ensure safe and competent practice.

Dr. Kris Justesen opposes Nevada's proposed changes and that Nevada should keep the current 24-hour injection therapy training requirement rather than increase it to 40 hours. Her position is that 24 hours is the standard in many western states, has a strong safety record, and is sufficient for basic injection therapy. She believes a 40-hour requirement would create unnecessary costs and barriers for practitioners without improving public safety. Also, requiring a 40-hour course may adversely affect neighboring states' practice act with similar elements.

Dr. David Flater's position is that 24 hours of training is sufficient for a Licensed Acupuncturist, who work with needles daily for their career, is sufficient to incorporate injection therapy in their practice. Also, the expense of additional training requirements for acupuncture injection point injection would add unnecessary costs and may discourage practitioners from offering a treatment he believes benefits patients.

Three other public comments emailed prior to the Workshop are that: (1) there's no economic impact from the regulations; (2) there's no economic impact from the regulations and that reduced application fees would help the prospective applicant get licensed sooner; and (3) there's support for the reduction in fees but would like an explanation regarding large decrease in the initial application and examination fees from \$1000 to \$500.

2. Presentation of proposed regulations/amendments and individual public comment on each:

- A. NAC 634A.071 Application deletes the requirement for the Applicant's social security number;**
- B. NAC 634A.080 Updates the name of the national organization, and clarifies the requirement of a current valid license in another state for endorsement eligibility; deletes the requirement for chemistry or biochemistry;**
- C. NAC 634A.085 Updates the name of the national organization;**
- D. NAC 634A.133 Updates the name of the national organization;**
- E. NAC 634A.137 Expands the automatic acceptance of all continuing education classes approved by the national organization;**

- F. NAC 634A.142 Adopts the national organization's Acupuncture Point Injection Therapy ("APIT") certificate of qualification and allows prior APIT endorsees registered with the Board prior to 2/1/2027 to maintain their endorsement status.**
- G. NAC 634A.165 Reduces and eliminates certain fees.**

The public attendees had no changes to the other regulations and wanted to address only NAC 634A.142.

3. Any general closing public comment

Dr. Justesen expresses concerns about a proposed 40-hour training requirement for APIT practitioners, stating that it would be excessive and unnecessary given the current scope of practice in states like Nevada, Utah, and Colorado, which is adequately covered by 24 hours of training. She states that other states with broader scopes such as intravenous therapies require more training for safety reasons. She states that instead of increasing training hours, the Board could consider a requirement for practitioners to have at least two years of experience before adding advanced techniques, similar to what was done in Utah for physical therapy and dry needling. She states that increasing training hours could create undue hardships and might influence neighboring states to adopt similar measures without evidence of adverse events currently occurring. She states that maintaining the 24-hour requirement would ensure fairness and public safety.

4. Close Workshop.

ED closes workshop.