

Joe Lombardo
Governor



Richard Whitley,
MS
Director

**DEPARTMENT OF
HEALTH AND HUMAN SERVICES**

 **NEVADA DIVISION of PUBLIC
and BEHAVIORAL HEALTH**



Cody Phinney,
MPH
Administrator

Ihsan Azzam,
Ph.D., M.D.
Chief Medical
Officer

NOTICE OF PUBLIC HEARING

Case #769, Black Knight Sports and Entertainment, LLC, variance to Nevada Administrative Code (NAC) 459.556, Administrative controls: Minimum exposure techniques; use of portable or mobile equipment, sections 556(1)(c) and (d).

NOTICE IS HEREBY GIVEN THAT Black Knight Entertainment LLC, 1550 S. Pavilion Center Drive, Las Vegas, NV 89135, is requesting a variance from NAC 459.556(1)(c) and (d) which states:

A public hearing will be conducted on September 6, 2024, at 9:00 am by the Nevada State Board of Health to consider this request. This meeting will be held online and at physical locations, listed below.

Physical Locations:

Southern Nevada Health District (SNHD)
Red Rock Trail Rooms A and B
280 S. Decatur Boulevard; Las Vegas, Nevada 89107

Nevada Division of Public and Behavioral Health (DPBH)
Hearing Room No. 303, 3rd Floor
4150 Technology Way; Carson City, Nevada 89706

Meeting Link:

https://teams.microsoft.com/l/meetup-join/19%3ameeting_ZjcxNGQzYjQtMzM1OS00MTNiLTg1ZWYtMmExODkwZTBkMTQ0%40thread.v2/0?context=%7b%22id%22%3a%22e4a340e6-b89e-4e68-8eaa-1544d2703980%22%2c%22oid%22%3a%22768e443d-3be6-48f0-9bb0-7e72f1276b8d%22%7d

Please Note: If you experience technical difficulties connecting online, please call into the meeting to participate by phone.

Join by Phone:

1-775-321-6111
Phone Conference ID Number: 382 183 728#

1. Procedures and auxiliary equipment designed to minimize exposure to the patient and personnel commensurate with obtaining the needed diagnostic information must be utilized, including the following:
 - (c) Except as otherwise provided in paragraph (d), portable or mobile equipment may be used only for:
 - (1) Examinations where it is impractical to transfer the patient to a stationary radiographic installation; and
 - (2) Its designed purpose, as specified by the manufacturer; and

- (d) Portable or mobile equipment may be used in lieu of stationary equipment for a period of not more than 90 days while the facility is awaiting the delivery of new stationary equipment or the repair of registered stationary equipment if the following conditions are satisfied:
 - (1) The portable or mobile equipment has been registered and the appropriate fee has been paid in accordance with NAC 459.154 and 459.161; and
 - (2) The registrant has requested, in writing, and been granted authorization from the Division to use the portable or mobile equipment in lieu of stationary equipment. Such a request must include, without limitation:
 - (I) The date of installation of the portable or mobile equipment; and
- (II) The expected duration of the use of the portable or mobile equipment.

Any person who, because of unique circumstances, is unduly burdened by a regulation of the State Board of Health and thereby suffers hardship and the abridgement of a substantial property right may apply for a variance from a regulation. (NAC 439.200(1))

1. The State Board of Health will grant a variance from a regulation only if it finds from the evidence presented at the hearing that:
 - (c) There are circumstances or conditions which:
 - (1) Are unique to the applicant.
 - (2) Do not generally affect other persons subject to the regulation.
 - (3) Make compliance with the regulation unduly burdensome; and
 - (4) Cause a hardship to and abridge a substantial property right of the applicant; and
 - (d) Granting the variance:
 - (1) Is necessary to render substantial justice to the applicant and enable him to preserve and enjoy his property; and
 - (2) Will not be detrimental or pose a danger to public health and safety.
2. Whenever an applicant for a variance alleges that he/she/they suffers or will suffer economic hardship by complying with the regulation, they must submit evidence demonstrating the costs of compliance with the regulation. The Board will consider the evidence and determine whether those costs are unreasonable. (NAC 439.240)

Therefore, it is important for your variance request to be as complete as possible. It is your responsibility to attach documentation supporting your variance request.

Statement of degree of risk of Health

The health risk is increased radiation exposure to radiological technologists, patients, and non-radiation workers such as support staff and members of the public

The authority of the State Board of Health to consider and grant a variance from the requirements of a regulation is set forth at NRS 439.200 and NAC 439.200 – 439.280.

Persons wishing to comment upon the proposed variance may appear at the scheduled public hearing or may submit written testimony at least five days before the scheduled hearing to:

Secretary, State Board of Health
Division of Public and Behavioral Health
4150 Technology Way, Suite 300
Carson City, NV 89706

Anyone wishing to testify for more than five minutes on the proposed variance must petition the Board of Health at the above address. Petitions shall contain the following: 1) a concise statement of the subject(s) on which the petitioner will present testimony; 2) the estimated time for the petitioner's presentation.

This notice has also been posted at the following locations:

DIVISION OF PUBLIC AND BEHAVIORAL HEALTH (DPBH), 4150 TECHNOLOGY WAY, CARSON CITY, NV
DIVISION OF PUBLIC AND BEHAVIORAL HEALTH WEBSITE:

<http://dpbh.nv.gov/Boards/BOH/Meetings/Meetings/>

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and BEHAVIORAL HEALTH**



Cody Phinney,
MPH
Administrator

Ihsan Azzam,
Ph.D., M.D.
Chief Medical
Officer

MEMORANDUM

DATE: July 11, 2024

TO: John Pennell, Chair State Board of Health

FROM: Cody Phinney, Administrator
Division of Public and Behavioral Health

RE: Variance Case #769 Black Knight Sports and Entertainment, LLC

Subject: Case #769, Black Knight Sports and Entertainment, LLC, variance to Nevada Administrative Code (NAC) 459.556, Administrative controls: Minimum exposure techniques; use of portable or mobile equipment, sections 556(1)(c) and (d).

Staff Review

For the reasons stated below and with the conditions specified, Division of Public and Behavioral Health (DPBH) staff recommend the State Board of Health approve Case #769, Black Knight Sports and Entertainment, LLC, request for a variance to NAC 459.556(1)(c) and (d).

NEVADA ADMINISTRATIVE CODE (NAC) 459.556(1)(c) and (d) state, in relevant part,

1. Procedures and auxiliary equipment designed to minimize exposure to the patient and personnel commensurate with obtaining the needed diagnostic information must be utilized, including the following:
 - (c) Except as otherwise provided in paragraph (d), portable or mobile equipment may be used only for:
 - (1) Examinations where it is impractical to transfer the patient to a stationary radiographic. Installation; and
 - (2) Its designed purpose, as specified by the manufacturer; and
 - (d) Portable or mobile equipment may be used in lieu of stationary equipment for a period of not more than 90 days while the facility is awaiting the delivery of new stationary equipment or the repair of registered stationary equipment if the following conditions are satisfied:
 - (1) The portable or mobile equipment has been registered and the appropriate fee has been paid in accordance with NAS 459.154 and 459.161; and
 - (2) The registrant has requested, in writing, and been granted authorization from the Division to use the portable or mobile equipment in lieu of stationary equipment. Such a request must include, without limitation:
 - (I) The date of installation of the portable or mobile equipment; and
 - (II) The expected duration of the use of the portable or mobile equipment.

Summary of Variance Request:

Variance applicant Black Knight Sports and Entertainment, LLC, submitted a request for variance from the requirements of NAC 459.556(1)(c) and (d) on July 10, 2024. The Applicant is requesting approval to use a portable x-ray machine in lieu of a stationary x-ray machine to provide imaging services for professional and collegiate athletic events being held at the T-Mobile Arena located at 3780 South Las Vegas Blvd. Las Vegas, NV 89109, the Lee's Family Forum located at 200 S Green Valley Pkwy, Henderson, NV 89012, and other sporting venues.

Intent of Regulation:

The intent of NAC 459.556(1) (c) and (d) are to protect the health and safety of radiologic technologist and patients by limiting the use of portable or mobile x-ray machines to situations where patients cannot be transferred to a stationary X-ray machine.

The reasons for limiting the use of portable or mobile x-ray machines include:

- Portable and mobile x-ray machines are intended for bedside use when a patient cannot be transported to the designated imaging room with a permanently installed imaging system. Examples include intensive care, critical care, emergency, and surgical patients.
- Portable and mobile x-ray machines produce poorer quality images as compared to stationary machines due to several factors such as: the x-ray tube is less stable, inconsistent measurement of the distance and angle between the x-ray tube and the x-ray film, and limited imaging settings. These factors may lead to blurred or poor-quality images, which will have to be retaken. Repeat imaging increases the overall radiation exposure to patients.
- Portable and mobile x-ray machines do not protect technologists from radiation as well as properly installed stationary machines.

Degree of risk to public health or safety:

The health risk is increased radiation exposure to radiological technologists, patients, and non-radiation workers such as support staff and or members of the public.

Background Information:

The Applicant performs x-ray imaging services at athletic events at the T-Mobile Arena located at 3780 South Las Vegas Blvd. Las Vegas, NV 89109, Lee's Family Forum located at 200 S Green Valley Pkwy, Henderson, NV 89012, and other sporting venues. The Applicant is not the sole owner of the arena and is not allowed to remodel the facility to accommodate a stationary x-ray machine. It is common practice for doctors and other medically trained staff to evaluate a player's injury at professional and collegiate athletic events. Some reasons for assessing injuries at the arena instead of sending the player to the hospital include:

- What seems like a minor injury could in fact be a more serious injury and allowing the player to continue would result in further damage to the player.
- Sending a player to the hospital will likely change the outcome of the event,
- Players may not report or downplay an injury to keep playing, which could result in further injury to the player.
- Professional athletic organizations such as the National Hockey League contractually mandate on site access to medical care for players, including x-ray services.

X-ray imaging is an important tool for assessing injuries and the use of portable x-ray systems at these events are not uncommon in other states.

The Applicant has made the following commitments to reduce health risks:

To protect radiological technologist:

- Technologists will not routinely hold or restrain patients when taking x-rays,
- Technologists have been provided additional training specific to the use of mobile x-ray machines and methods to control the area where x-rays are taken, in order to reduce exposures to ancillary persons and members of the public at the facility.
- The following equipment will be provided:
 - Lead aprons with thyroid collars for technologists,
 - Shielding for patients,
 - Patient table for performing x-rays, and
 - Positioning foams to stabilize patients and minimize movement during x-ray exams.

To reduce exposure to ancillary persons and other non-radiation workers:

- The area where x-rays are taken will be controlled and access limited to only persons necessary for the examination.

To ensure adequate management oversight of these activities:

- Radiation safety personnel will perform oversight of the entire process to include observations or demonstrations of work being performed at least annually and when a new x-ray technologist works independently.

To ensure radiation exposure to patients are maintained as low as reasonably achievable the Applicant will:

- Ensure a medical doctor is on site to prescribe x-rays and to evaluate if an x-ray should be taken using a portable or mobile x-ray machine or if the player needs to be sent off site to a stationary x-ray machine.
- Track all repeat images and review the data to ensure repeat images are kept at an acceptable level and implement corrective actions if needed.

RCP considers the determination of the types of examinations that should be performed using a portable or mobile x-ray machine a medical decision that should be made by the physician who prescribes the x-ray in consultation with the Applicant.

The Applicant has agreed to implement the above commitments.

Approval of the variance with the above commitments will minimize the detriment to public health and safety to the extent practical.

Exceptional and undue hardship:

Strict application of 459.556(1)(c) and (d), would require the Applicant to send players to an imaging facility that has a stationary x-ray machine. Sending a player to another facility would likely remove them from the event, which would affect both the event and the player. Players not wanting to be removed from an event may be reluctant to reveal or even hide an injury to keep playing, which could result in further injury to the player. With all the pressures and competition among athletic teams, it is in the best interest of the players, teams, fans, owners, and supporting organizations for injured players to be assessed at the arena. It can help prevent further injury to players. X-ray imaging services are an important part of the medical assessment process.

The circumstances associated with this variance are unique. The Applicant is not the sole owner and cannot remodel the arena to install a stationary x-ray machine. Moving the event to another arena is not practical. The number of x-rays taken is extremely low, for example in 2023, the Applicant performed one x-ray exam on one player during each athletic event.

Compliance with the regulation in this case is unduly burdensome given the Applicant has provided adequate protection for technologists, committed to taking actions necessary to maintain patient and ancillary persons radiation exposures to levels that are as low as reasonably achievable. As stated above there are several adverse consequences associated with a strict application of the regulation which would create a hardship for the players, teams, and supporting organizations.

Approval of this variance is not expected to affect other persons subject to the regulations. The program would support a variance for professional and collegiate athletic events from other registrants with the same conditions and commitments.

Staff Recommendation

DPBH staff recommend the State Board of Health approve Variance Case #769 Black Knight Sports and Entertainment, LLC request for a variance to NAC 459.556(1)(c) and (d) for a period of 5 years and with the condition that the Applicant continues to implement their commitments.

Impairment to the purpose of the regulation:

Approval of the variance could result in increased radiation exposure to radiological technologists and patients. However, implementation of the commitments will reduce radiation exposures to both radiological technologists and patients to acceptable levels that are reasonably achievable.

Public Comments:

Notice of the hearing is scheduled to be posted on the Division of Public & Behavioral Health website at <http://dpbh.nv.gov/Boards/BOH/Meetings/Meetings/> and at the 4150 Technology Way Office in Carson City, NV 89706 by August 22, 2024, by 9:00 am. The Division of Public & Behavioral Health is not aware of any objections to this variance by any local authorities, and no public comments have been received to date.

Presenter:

John Follette, Manager Radiation Control
Program Division of Public and Behavioral
Health
Bureau Health Protection and Preparedness



NEVADA STATE BOARD OF HEALTH
4150 Technology Way, Suite 300 CARSON CITY, NV 89706

APPLICATION FOR VARIANCE

Please check the appropriate box that pertains to the NAC for which you are requesting a variance.

Division Administration
(NAC 439, 441A, 452, 453A, & 629)

Health Care Quality & Compliance
(NAC 449, 457, 459 & 652)
Radiation control program

Child, Family & Community Wellness
(NAC 392, 394, 432A, 439, 441A, & 442)

Office of State Epidemiology
(NAC 440,450B, 452, 453, 453A, & 695C)

Public Health & Clinical Services
(NAC 211, 444, 446, 447, 583, & 585)

Date: July 10, 2024

Name of Applicant: Black Knight Entertainment LLC

Phone: 725 264-7248

Mailing Address: 1550 S. Pavilion Center Drive

City: Las Vegas

State: Nevada

Zip: 89135

We do hereby apply for a variance to
chapter/section **NAC 459.556(1)(c)** of the Nevada Administrative
Code (NAC). (For example: NAC 449.204)

Title of section in
question: (NAC) 459.556(1)(c) and (d)



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Statement of existing or proposed conditions in violation of the NAC:

NEVADA ADMINISTRATIVE CODE (NAC) 459.556(1)(c) and (d) state, in relevant part,

1. Procedures and auxiliary equipment designed to minimize exposure to the patient and personnel commensurate with obtaining the needed diagnostic information must be utilized, including the following:

(c) Except as otherwise provided in paragraph (d), portable or mobile equipment may be used only for:

(1) Examinations where it is impractical to transfer the patient to a stationary radiographic installation; and

(2) Its designed purpose, as specified by the manufacturer; and

(d) Portable or mobile equipment may be used in lieu of stationary equipment for a period of not more than 90 days while the facility is awaiting the delivery of new stationary equipment or the repair of registered stationary equipment if the following conditions are satisfied:

(1) The portable or mobile equipment has been registered and the appropriate fee has been paid in accordance with NAC 459.154 and 459.161; and

(2) The registrant has requested, in writing, and been granted authorization from the Division to use the portable or mobile equipment in lieu of stationary equipment. Such a request must include, without limitation:

(I) The date of installation of the portable or mobile equipment; and

(II) The expected duration of the use of the portable or mobile equipment.

Date of initial operation (if existing): N o v 2 0 2 3



NEVADA STATE BOARD OF HEALTH
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APPLICATION FOR VARIANCE

ATTENTION: Please read this section closely. Your request for variance will be examined against these criteria:

Any person who, because of unique circumstances, is unduly burdened by a regulation of the State Board of Health and thereby suffers hardship and the abridgement of a substantial property right may apply for a variance from a regulation. (NAC 439.200(1))

1. The State Board of Health will grant a variance from a regulation only if it finds from the evidence presented at the hearing that:
 - (a) There are circumstances or conditions which:
 - (1) Are unique to the applicant.
 - (2) Do not generally affect other persons subject to the regulation.
 - (3) Make compliance with the regulation unduly burdensome; and
 - (4) Cause a hardship to and abridge a substantial property right of the applicant; and
 - (b) Granting the variance:
 - (1) Is necessary to render substantial justice to the applicant and enable him to preserve and enjoy his property; and
 - (2) Will not be detrimental or pose a danger to public health and safety.
2. Whenever an applicant for a variance alleges that he/she/they suffers or will suffer economic hardship by complying with the regulation, they must submit evidence demonstrating the costs of compliance with the regulation. The Board will consider the evidence and determine whether those costs are unreasonable. (NAC 439.240)

Therefore, it is important for your variance request to be as complete as possible. It is your responsibility to attach documentation supporting your variance request.

Statement of degree of risk of Health

The health risk is increased radiation exposure to radiological technologists, patients, and non-radiation workers such as support staff and or members of the public.

Background information:

The Applicant performs x-ray imaging services at athletic events at the T-Mobile Arena located at 3780 South Las Vegas Blvd. Las Vegas, NV 89109, Lee's Family Forum located at 200 S Green Valley Pkwy, Henderson, NV 89012, and other sporting venues. The Applicant is not the sole owner of the arena and is not allowed to remodel the facility to accommodate a stationary x-ray machine. It is common practice for doctors and other medically trained staff to evaluate a player's injury at professional and collegiate athletic events. Some reasons for assessing injuries at the arena instead of sending the player to the hospital include:

- What seems like a minor injury could in fact be a more serious injury and allowing the player to continue would result in further damage to the player.



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APPLICATION FOR VARIANCE

- Sending a player to the hospital will likely change the outcome of the event.
- Players may not report or downplay an injury to keep playing, which could result in further injury to the player.
- Professional athletic organizations such as the National Hockey League contractually mandate on site access to medical care for players, including x-ray services.

X-ray imaging is an important tool for assessing injuries and the use of portable x-ray systems at these events are not uncommon in other states.

The Applicant has made the following commitments to reduce health risks:

To protect radiological technologist:

- Technologists will not routinely hold or restrain patients when taking x-rays,
- Technologists have been provided additional training specific to the use of mobile x-ray machines and methods to control the area where x-rays are taken, in order to reduce exposures to ancillary persons and members of the public at the facility.
- The following equipment will be provided:
 - Lead aprons with thyroid collars for technologists,
 - Shielding for patients,
 - Patient table for performing x-rays, and
 - Positioning foams to stabilize patients and minimize movement during x-ray exams.

To reduce exposure to ancillary persons and other non-radiation workers:

- The area where x-rays are taken will be controlled and access limited to only persons necessary for the examination.

To ensure adequate management oversight of these activities:

- Radiation safety personnel will perform oversight of the entire process to include observations or demonstrations of work being performed at least annually and when a new x-ray technologist works independently.

To ensure radiation exposure to patients are maintained as low as reasonably achievable the Applicant will:

- Ensure a medical doctor is on site to prescribe x-rays and to evaluate if an x-ray should be taken using a portable or mobile x-ray machine or if the player needs to be sent off site to a stationary x-ray machine.
- Track all repeat images and review the data to ensure repeat images are kept at an acceptable level and implement corrective actions if needed.

RCP considers the determination of the types of examinations that should be performed using a portable or mobile x-ray machine a medical decision that should be made by the physician who prescribes the x-ray in consultation with the Applicant.

The Applicant has agreed to implement the above commitments. (See Attachment A).

Approval of the variance with the above commitments will minimize the detriment to public health and safety to the extent practical.



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APPLICATION FOR VARIANCE

Please state in detail the circumstances or conditions which demonstrate that:

1. An exceptional and undue hardship results from a strict application of the Regulation:
 - A. Strict application of 459.556(1)(c) and (d), would require the Applicant to send players to an imaging facility that has a stationary x-ray machine. Sending a player to another facility would likely remove them from the event, which would affect both the event and the player. Players not wanting to be removed from an event may be reluctant to reveal or even hide an injury to keep playing, which could result in further injury to the player. With all the pressures and competition among athletic teams, it is in the best interest of the players, teams, fans, owners, and supporting organizations for injured players to be assessed at the arena. It can help prevent further injury to players. X-ray imaging services are an important part of the medical assessment process.
 - B. The circumstances associated with this variance are unique. The Applicant is not the sole owner and cannot remodel the arena to install a stationary x-ray machine. Moving the event to another arena is not practical. The number of x-rays taken is extremely low, for example in 2023, the Applicant performed an average of 1 x-ray exam during each athletic event.
 - C. Compliance with the regulation in this case is unduly burdensome given the Applicant has provided adequate protection for technologists, committed to taking actions necessary to maintain patient and ancillary persons radiation exposures to levels that are as low as reasonably achievable. As stated above there are several adverse consequences associated with a strict application of the regulation which would create a hardship for the players, teams, and supporting organizations.
2. The variance, if granted, would not:
 - a. Cause substantial detriment to the public welfare.
 - i. The Applicant has made the following commitments to reduce health risks:
 - ii. To protect radiological technologist:
 - iii. Technologists will not routinely hold or restrain patients when taking x-rays,
 - iv. Technologists have been provided additional training specific to the use of mobile x-ray machines and methods to control the area where x-rays are taken, in order to reduce exposures to ancillary persons and members of the public at the facility.
 - b. The following equipment will be provided:
 - i. Lead aprons with thyroid collars for technologists,
 - ii. Shielding for patients,
 - iii. Patient table for performing x-rays, and
 - iv. Positioning foams to stabilize patients and minimize movement during x-ray exams.



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APPLICATION FOR VARIANCE

- c. To reduce exposure to ancillary persons and other non-radiation workers:
 - i. The area where x-rays are taken will be controlled and access limited to only persons necessary for the examination.
 - d. To ensure radiation exposure to patients are maintained as low as reasonably achievable the Applicant will:
 - i. Ensure a medical doctor is on site to prescribe x-rays and to evaluate if an x-ray should be taken using a portable or mobile x-ray machine or if the patient needs to be sent off site to a stationary x-ray machine.
 - ii. Track all repeat images and review the data to ensure repeat images are kept at an acceptable level and implement corrective actions if needed.
 - e. RCP considers the determination of the types of examinations that should be performed using a portable or mobile x-ray machine a medical decision that should be made by the physician who prescribes the x-ray in consultation with the Applicant.
 - f. The Applicant has agreed to implement the above commitments.
 - i. Approval of the variance with the above commitments will minimize the detriment to public health and safety to the extent practical.
2. Impair substantially the purpose of the regulation from which the application seeks a variance.
- a. Approval of the variance could result in increased radiation exposure to radiological technologists and patients. However, implementation of the commitments above, will reduce radiation exposures to both radiological technologists and patients to acceptable levels that are reasonably achievable.

The bureau may require the following supporting documents to be submitted with and as a part of this application:

Specific Request:

DPBH staff recommend the State Board of Health approve Variance Case #Black Knight Sports and Entertainment, LLC request for a variance to NAC 459.556(1)(c) and (d) for a period of 5 years and with the condition that the Applicant continues to implement the commitments in attachment A.



NEVADA STATE BOARD OF HEALTH
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APPLICATION FOR VARIANCE

- 1. Legal description of property concerned
- 2. General area identification map
- 3. Plot map showing locations of all pertinent items and appurtenances
- 4. Well log (if applicable)
- 5. Applicable lab reports
- 6. Applicable engineering or construction/remodeling information
- 7. Other items (see following pages)

This application must be accompanied by evidence demonstrating the costs of your compliance with regulations or specific statutory standards. Your request will be placed on the Board of Health agenda 40 days or more after receipt in this office if accompanied by the required fee (NAC 439.210). The application and supporting documentation will form the basis for the Division of Public and Behavioral Health staff report and recommendation(s) to the Board. Failure to respond to the above statements may cause the Board to deny consideration of the application at the requested Board meeting.



I am/we are requesting this variance request be placed on the next regularly scheduled Board of Health agenda. It is understood that I/we can attend in person at either physical location in Carson City or Las Vegas or we may attend virtually.

Signature:

Printed Name:

Steve McCauley MHS, ATC, CSCS

Title:

Director of Performance and Sports Medicine

Date:

7.10.24



NEVADA DIVISION of PUBLIC
and BEHAVIORAL HEALTH 

NEVADA STATE BOARD OF HEALTH
4150 Technology Way, Suite 300 CARSON CITY, NV 89706

APPLICATION FOR VARIANCE

**PLEASE SUBMIT YOUR APPLICATION FOR VARIANCE BY USING
ANY OF THE FOLLOWING METHODS:**

MAIL TO:

Secretary, Nevada State Board of Health
Division of Public and Behavioral Health
4150 Technology Way, Suite 300
Carson City, NV 89706

FAX:

775-687-7570

EMAIL:

DPBH@health.nv.gov
StateBOH@health.nv.gov