

Joe Lombardo
Governor



Richard Whitley,
MS
Director



Cody Phinney,
MPH
Administrator

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

NOTICE OF PUBLIC HEARING

Case #782, SimonMed Imaging, LLC, variance to Nevada Administrative Code (NAC) 653.400 Scope of practice for radiologist assistants and persons who hold licenses or limited licenses, section 653.400(1)(c).

NOTICE IS HEREBY GIVEN THAT SimonMed Imaging, LLC has requested a variance from Nevada Administrative Code, 653.400(1)(c).

A public hearing will be conducted on March 7, 2025, 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_ZWE1NGZjMDAtM2JmZi00NjVjLWExMzYtNTRjZDFkZGRmY2Iz%40thread.v2/0?context=%7b%22Tid%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: 679 573 018#

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/>

Joe Lombardo
Governor



Richard Whitley,
MS
Director



Cody Phinney,
MPH
Administrator

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

MEMORANDUM

DATE: February 5, 2025
TO: John Pennell, Chair
State Board of Health
FROM: Cody Phinney, Administrator
Division of Public and Behavioral Health
RE: Variance Case # 782 SimonMed Imaging, LLC

Subject: Case #782, SimonMed Imaging, LLC, variance to Nevada Administrative Code (NAC) 653.400 Scope of practice for radiologist assistants and persons who hold licenses or limited licenses, section 653.400(1)(c).

Staff Review

For the reasons stated below and with the conditions specified, the Division of Public and Behavioral Health ("DPBH") staff recommend the State Board of Health approve Case #782, SimonMed Imaging, LLC's request for a variance from NAC 653.400(1)(c).

NEVADA ADMINISTRATIVE CODE (NAC) 653.400(1)(c) states, in relevant part,

A person who holds a license to engage in radiologic imaging issued pursuant to NRS 653.310 to 653.910, inclusive:

- (1) May, while under the supervision of a licensed practitioner, if applicable, use ionizing radiation for diagnostic purposes or to visualize a medical condition by applying the ionizing radiation emitted from X-ray machines to any part of the human body.
- (2) May, in conjunction with the study of radiation, administer contrast agents and related drugs for diagnostic purposes.
- (3) May perform diagnostic radiographic and noninterpretive fluoroscopic procedures, as prescribed by a licensed practitioner, and may assist the licensed practitioner with fluoroscopic and specialized radiologic procedures.
- (4) Shall perform his or her duties in accordance with the Standards of

Ethics adopted by reference in subsection 2 of NAC 653.090.

Summary of Variance Request:

On January 14, 2025, variance applicant SimonMed Imaging, LLC ("Applicant") submitted a request for variance from the requirements of NAC 653.400(1)(c). The Applicant is requesting authorization to perform remote Computed Tomography ("Remote CT") imaging. Remote CT is a new technology that allows an offsite technologist to remotely initiate CT imaging. The Remote CT is accomplished using visual and vocal communications between the CT technologist, patient, and an assisting person at the facility.

Persons licensed to perform radiological imaging include a radiological technologist ("RT tech"), a Radiation Therapist ("RT therapist"), and Nuclear Medicine Technologists ("NMT") and collectively referred to as "RT's"). Persons licensed to perform CT have additional training and certification specific to Remote CT (hereinafter referred to as "CT Technologists").

This variance proposes using a RT Tech (or RT therapist) at the remote location and an RT tech (or RT tech") as the person assisting at the site where the patient is being imaged. A variance is needed to expand the scope of practice for RTs in NAC 653.400 to include assisting with Remote CT imaging.

Intent of Regulation:

NAC 653.400(1)(c) defines the scope of practice for persons licensed to engage in radiologic imaging to ensure technologist have adequate training and qualifications to safely image patients and to protect themselves, other workers, and the public from radiation.

Remote CT is a new technology which was not in use when NAC Chapter 653 was promulgated and therefore not included in the current regulations. The Applicant is requesting a variance to include within the scope of practice for RTs the duties and tasks necessary to assist a CT tech with remote imaging. The additional scope of practice for assisting with Remote CT include tasks that must be performed at the imaging site including administering CT contrast, positioning the patient, operating the CT console under the direction of the remote CT tech, responding to emergency situations, and ensuring the radiation safety of the patient and other workers. Licensed RTs already perform these duties for other modalities of radiologic imaging but not for CT Remote. CT Remote has specific training requirements in addition to the training required for other radiation producing machines. To ensure the intent of the regulation is met, the assisting tech will be trained to the same standards as a certified CT tech for the tasks they perform.

Exceptional and undue hardship:

Strict application of 653.400(1)(c) requires the Applicant to have a licensed CT tech at each imaging site, which is restricting medical providers' ability to image and care for patients. The State is experiencing a shortage of imaging technologists across all modalities, but especially for CT. The state licenses around 3,100 persons to perform radiological imaging and of these 723 are licensed to perform Remote CT. The shortage

of licensed CT tech's is affecting patients, medical care providers, and hospital emergency rooms. Patients who require a CT exam must schedule the CT exam weeks in advance or go to a hospital emergency room. This hinders a medical provider's ability to provide patient care, increases the patients cost for care, and places an additional burden on emergency rooms. Remote CT can help alleviate the impact of this shortage because it enables one CT technologist to provide services for multiple medical providers from a central location.

Approval of this variance is not expected to adversely affect other persons subject to the regulations because DPBH would support variances from other registrants who would benefit from this technology under the same conditions.

Degree of risk to public health or safety:

The Applicant has asserted that the variance, if granted, would not cause substantial detriment to public welfare or pose a danger to public health and safety, but rather be for the betterment of public health and safety as it will further medical provider's ability to perform CTs for diagnoses of medical conditions.

CT examinations are normally performed with a licensed CT technologist present with the patient at the imaging facility. Remote CT examinations can be performed with the same level of safety by having a licensed CT technologist at the remote location and a licensed RT technologist present with the patient at the imaging location. The licensed RT will be trained to competently assist with CT imaging and to handle emergency situations. The benefit of remote CT is, it allows the medical provider to make CT imaging services available at more locations.

Background Information:

The State of Nevada licenses around 3,100 persons for radiological imaging and of these, 723 persons are licensed to perform CT. The State of Nevada is experiencing a shortage of imaging technologists across all modalities, but especially for CT and Magnetic Resonance Imaging (MRI) technologists. Remote CT imaging enables a CT tech to provide services for multiple medical offices from a central location thereby helping to provide CT imaging services to medical facilities who are unable to obtain the services of a CT technologist.

Remote CT is a new technology that allows offsite technologists to remotely initiate CT imaging. The remote CT is accomplished using visual and vocal communications between the CT technologist, patient, and an assisting person at the imaging facility. The Radiation Control Program reviewed information provided by Applicant for the Siemens Healthineers' syngo Virtual Cockpit (Version VB10A), Ionic Health's Command Lite System, and the Phillips Medical Systems Nederland B.V.'s Radiological Operations Command Center (ROCC) Console and verified that they are approved by the U.S. Food and Drug Administration (FDA) for the remote operation of CT systems. Sharing the technical expertise of a licensed CT technologist among medical facilities has the potential for increasing patient access to CT services.

Persons licensed to perform radiological imaging must be certified by the American Registry of Radiologic Technologists (ARRT), as a Radiography Technologist (RT). To perform CT imaging, RTs must complete additional training to become certified in CT. The variance proposes to use a CT technologist at the remote location and a RT technologist with additional training in CT as the assisting person at the site where the

patient is being imaged. The variance is needed to expand the scope of practice for RTs in NAC 653.400(1)(c) to include assisting with remote CT imaging.

The ARRT has established structured educational and clinical experience requirements for CT certification, which includes a list of tasks that CT technologists perform. To ensure patients are imaged by qualified and competent persons, the assisting RT will be trained to the ARRT educational and clinical training requirements for CT technologist for the specific tasks they perform. The training will incorporate appropriate sections of the CT Curriculum established by the American Society of Radiologic Technologists (ASRT). The RT is not required to be trained on all aspects of CT, just the tasks they perform. The training can be developed and provided by the Applicant, a contractor, consultant, manufacturer, or educational institution, provided the level of training is commensurate with the RT's duties and responsibilities. Persons licensed as Nuclear Medicine Technologist (NMT), Radiation Therapist, and grandfathered CT technologist can also assist with remote CT provided they complete the licensee's training described above.

Applicant has agreed to develop, document, and maintain a radiation safety program to ensure the safe use of this new technology. The program elements of the radiation safety program are in attachment A. The Applicant's commitment to develop, document, and maintain a radiation safety program is in attachment B. Approval of the variance with the above conditions will minimize the risk to public health and safety to the extent practical.

Impairment to the purpose of the regulation:

Approval of this variance will not impair the purpose of the regulation because a CT technologist at the CT Remote location will be fully participating throughout the imaging process thorough vocal and visual communications and the assisting RT will be trained to the same level as a CT technologist for the specific tasks they perform at the imaging location. Applicant will develop, document, and maintain a radiation safety program specific to remote CT that includes adequate controls to ensure the safety of patients, other workers, and members of the public.

Public Comments Received:

None.

Staff Recommendation:

DPBH staff recommend the State Board of Health approve Case #782, SimonMed Imaging, LLC's request for variance to NAC 653.400(1)(c) for a period of 10 years with the condition Applicant will implement the commitments in Attachment B.

Presenter:

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

Attachments:

- A. Radiation Safety Program Elements for Remote Computed Tomography
- B. Applicants Commitments

Attachment A

Radiation Safety Program Elements for Remote Computed Tomography

Applicant will develop, document, and maintain a radiation safety program with the following provisions:

- a. Use only Remote CT systems and components that can adequately protect patient information and to establish policies and procedures for ensuring patient information is protected at the imaging facility, remote imaging locations, and locations where other members of the medical team will be viewing or accessing patient information. Remote CT systems or components must be approved by the Food and Drug Administration (FDA) prior to use, when approval is required by the FDA.
- b. Maintain a list of remote locations and associated imaging sites. The list is to contain the name of the facility, location, and name, telephone number of the primary contact person.
- c. The assisting technologist must be licensed to perform radiological imaging as RT tech, RT therapist, Nuclear Medicine Technologists or to perform CT. The remote CT technologist must be licensed by the State of Nevada to perform Remote CT and, if performing, Remote CT in other states, they must obtain state licensure in those states, if required by law.
- d. Define the roles and responsibilities for the Remote CT tech and the assisting technologist.
- e. Identify the tasks performed by assisting and remote technologists and develop procedures for these tasks.
- f. Train the assisting technologist to the ARRT educational and clinical training requirements for CT technologist for the specific tasks they perform. The training will incorporate appropriate sections of the CT Curriculum established by the American Society of Radiologic Technologists (ASRT).
- g. Ensure the assisting technologist completes annual radiation safety training related to their CT responsibilities.
- h. Ensure the assisting technologist maintains constant surveillance of the patient throughout the CT imaging procedure and performs only one CT imaging procedure at a time.
- i. Ensure the Remote CT technologist maintains constant surveillance via vocal and visual communications throughout a CT imaging procedure and performs only one CT imaging procedure at a time.
- j. Ensure Remote CT will not be performed if communications (verbal and virtual) or connectivity between the remote site and the imaging facility is not functioning properly or is otherwise unreliable.
- k. Develop procedures for responding to emergencies and situations where there may be a loss of connectivity between the remote site and the imaging facility.
- l. Perform checks of the communication system (verbal and visual) and the functionality and connectivity between the remote location and the imaging facility prior to initiating each CT imaging procedure.
- m. Comply with the requirements in NAC 459.551 and 459.559 for reporting a medical event and/or misadministration.
- n. Follow all the manufacturer's recommendations for servicing, testing, and maintaining both the CT and Remote CT systems.
- o. Develop policies and procedures to ensure adequate management oversight of remote operations, including audits to evaluate the effectiveness and safety of the remote CT operations, observations of work being performed at both the imaging facility and the remote location, and

processes to identify, track, investigate, and implement corrective actions for incidents where CT exams are incomplete or repeated.

Attachment B

Applicant Commitments for Remote Computed Tomography

January 14, 2025

Radiation safety program elements for Remote CT

This letter serves as a commitment by SimonMed to develop, document and maintain a radiation safety program with the following provisions:

- Use only remote CT systems and components that can adequately protect patient information and to establish policies and procedures for ensuring patient information is protected at the imaging facility, remote imaging locations, and locations where other members of the medical team will be viewing or accessing patient information. Remote CT systems or components must be approved by the Food and Drug Administration (FDA) prior to use, when approval is required by the FDA.
- Maintain a list of the remote locations and associated imaging sites. The list is to contain the name of the facility, location and a contact person.
- The assisting technologist will be licensed to perform radiological imaging as radiological technologists (RT), Radiation Therapist, Nuclear Medicine Technologists (NMT) or CT to assist with CT. The remote CT tech must be licensed by the State of Nevada to perform CT and if performing remote CT at locations in other states, they must obtain state licensure in those states, if required.
- Define the roles and responsibilities of the remote CT technologist and the assisting technologist.
- Identify the tasks performed by the assisting and remote technologists and develop procedures for these tasks.
- Train the assisting technologist to the ARRT educational and clinical training requirements for CT techs for the specific tasks they perform. The training will incorporate appropriate sections of the CT curriculum established by the American Society of Radiologic Technologist (ASRT).
- Ensure the assisting technologist completed annual radiation safety training related to their CT responsibilities.
- Ensure the assisting technologist maintains constant surveillance of the patient throughout the CT imaging procedure and performs only one CT imaging procedure at a time.
- Ensure the remote CT will not be performed if communications or connectivity between the remote site and imaging facility is not functioning properly or is otherwise unreliable.
- Develop procedures for responding to emergencies and situations where there may be a loss of connectivity between the remote site and the imaging facility.
- Perform checks of the communication system and the functionality and connectivity between the remote location and the imaging facility prior to initiating each CT imaging procedure.
- Ensure the remote CT technologist maintains constant surveillance via audio and visual communications throughout a CT imaging procedure and performs only one CT imaging procedure at a time.
- Ensure the CT tech at the remote locations is licensed in the State of Nevada to perform CT.
- Follow all the manufacturer's recommendations for servicing, testing and maintaining both the CT and remote CT systems.
- Comply with the requirements in NAC 459.551 and 459.559 for reporting a medical event or medical misadministration.
- Develop policies and procedures to ensure adequate management oversight of remote operations, including audits to evaluate the effectiveness and safety of the remote CT operations, observations of work being

performed at both the imaging facility and the remote location, and processes to identify, track, investigate, and implement corrective actions for incidents where CT exams are incomplete or repeated.



January 14, 2025

Radiation safety program elements for Remote CT

This letter serves as a commitment by SimonMed Imaging to develop, document and maintain a radiation safety program with the following provisions:

- Use only remote CT systems and components that can adequately protect patient information and to establish policies and procedures for ensuring patient information is protected at the imaging facility, remote imaging locations, and locations where other members of the medical team will be viewing or accessing patient information. Remote CT systems or components must be approved by the Food and Drug Administration (FDA) prior to use, when approval is required by the FDA.
- Maintain a list of the remote locations and associated imaging sites, The list is to contain the name of the facility, location and a contact person.
- The assisting technologist will be licensed to perform radiological imaging as radiological technologists (RT), Radiation Therapist, Nuclear Medicine Technologists (NMT) or CT to assist with CT. The remote CT tech must be licensed by the State of Nevada to perform CT and if performing remote CT at locations in other states, they must obtain state licensure in those states, if required.
- Define the roles and responsibilities of the remote CT technologist and the assisting technologist.
- Identify the tasks performed by the assisting and remote technologists and develop procedures for these tasks.
- Train the assisting technologist to the ARRT educational and clinical training requirements for CT techs for the specific tasks they perform. The training will incorporate appropriate sections of the CT curriculum established by the American Society of Radiologic Technologist (ASRT).
- Ensure the assisting technologist completes annual radiation safety training related to their CT responsibilities.
- Ensure the assisting technologist maintains constant surveillance of the patient throughout the CT imaging procedure and performs only one CT imaging procedure at a time.
- Ensure the remote CT will not be performed if communications or connectivity between the remote site and imaging facility is not functioning properly or is otherwise unreliable.
- Develop procedures for responding to emergencies and situations where there may be a loss of connectivity between the remote site and the imaging facility.
- Perform checks of the communication system and the functionality and connectivity between the remote location and the imaging facility prior to initiating each CT imaging procedure.
- Ensure the remote CT technologist maintains constant surveillance via audio and visual communications throughout a CT imaging procedure and performs only one CT imaging procedure at a time.
- Ensure the CT tech at the remote locations is licensed in the State of Nevada to perform CT.
- Follow all the manufacturer's recommendations for servicing, testing and maintaining both the CT and remote CT systems.
- Comply with the requirements in NAC 459.551 and 459.559 for reporting a medical event or medical misadministration.
- Develop policies and procedures to ensure adequate management oversight of remote operations, including audits to evaluate the effectiveness and safety of the remote CT operations, observations of work being performed at both the imaging facility and the remote location, and processes to identify,

16220 N. Scottsdale Rd., Suite 600 | Scottsdale, Arizona 85254 | www.simonmed.com



SimonMed™
See Tomorrow Today

track, investigate, and implement corrective actions for incidents where CT exams are incomplete or repeated.

Alyssa Lorenzo

Alyssa Lorenzo
Director of Compliance
SimonMed Imaging
602-688-6116

16220 N. Scottsdale Rd., Suite 600 | Scottsdale, Arizona 85254 | www.simonmed.com



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)

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: _____

Name of Applicant: _____

Phone: _____

Mailing Address: _____

City: _____

State: _____

Zip: _____

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

Title of section in
question: _____

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



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

APPLICATION FOR VARIANCE

Date of initial operation (if existing): _____

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 a 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 _____



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

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:

2. The variance, if granted, would not:

- A. Cause substantial detriment to the public welfare.

- B. Impair substantially the purpose of the regulation from which the application seeks a variance.

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

Specific Request:



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

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 virtual.

Signature: *Alyssa Lorenzo*

Printed Name: _____

Title: _____

Date: _____



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